



OUTLAW REGIME: A CHRONICLE OF IRAN'S DESTRUCTIVE ACTIVITIES

2020 Edition



Iran Action Group
U.S. DEPARTMENT OF STATE



“America will not be held hostage
to nuclear blackmail.”

PRESIDENT DONALD J. TRUMP, MAY 2018



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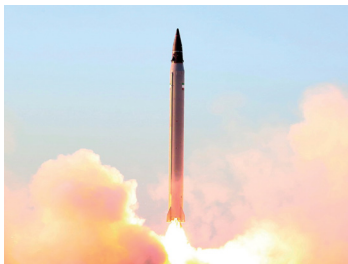
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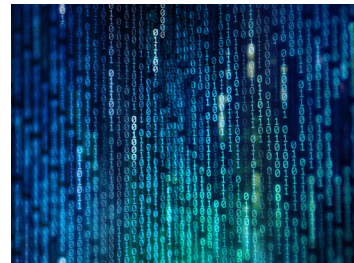
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A LETTER FROM U.S. SECRETARY OF STATE MICHAEL R. POMPEO



The Trump Administration harbors no illusions about the nature of the Islamic Republic of Iran: it is a radically revolutionary, outlaw regime, the world's leading state sponsor of terror and anti-Semitism, and the principal driver of instability in the Middle East. The United States made the necessary and responsible decision to exit from the Joint Comprehensive Plan of Action (JCPOA), a flawed deal premised on the hopes of appeasement that failed to protect the American people and our allies, or prevent the regime from obtaining a nuclear weapon. President Trump offered the Iranian regime a choice: either negotiate a new, comprehensive deal or face unprecedented U.S. sanctions and manage economic collapse. Since then, the Islamic Republic chose the latter, rejecting diplomacy and doubling down on its revolutionary agenda. It

has used the benefits it gained from the JCPOA – including billions in sanctions relief – to continue fueling violence and instability.

In response to Iran's choice to pursue hostility and aggressive acts, this administration has implemented the unprecedented Maximum Pressure Campaign. We have made good on our commitments by imposing the toughest sanctions regime ever against the corrupt leadership of the Islamic Republic. Our sanctions have denied Iran more than 90% of its oil export revenue, depriving the regime access to well over \$70 billion in income that could have otherwise gone to fund terror operations – while preserving avenues for humanitarian trade and assistance. These actions have saved the lives of innumerable Iranians, Syrians, Iraqis, Yemenis, and other innocent civilians in the regime's crosshairs.

Two years ago, I said it was important that the world understand the full spectrum of Iran's malign influence; its support to Shia militia groups in Iraq, its longstanding sponsorship of Hizballah in Lebanon, its use of Afghan and Pakistani refugees as cannon fodder in Syria, and most of all the regime's systematic disregard for the human rights of its own people inside Iran. Sadly, since we last published this report, the Iranian regime has found new ways to harm Iranians and recklessly extort the international community.

The regime has threatened freedom of navigation and global economic stability by mining and detaining commercial vessels in and around the Strait of Hormuz. In a brazen attack, Iran launched more than 25 land attack cruise missiles and unmanned aerial vehicles directly from its own soil last year against the world's largest oil processing facilities in Saudi Arabia. Just a few months later, Iran struck U.S. and coalition forces stationed in Iraq on the frontline of the fight against ISIS. Yet the regime's attempt to extort the international community into

backing down only increased its isolation and brought the world together to condemn Iran's violence.

The Iranian regime's continued acts of aggression beyond its borders is consistent with its campaign of terror and repression at home. In response to widespread protests in November 2019 the regime executed a brutal crackdown, killing as many as 1,500 of its own citizens while jailing thousands more. In an attempt to hide its actions from the world, the regime simultaneously imposed a near-total shutdown of access to the internet. In September, the regime tortured and executed champion wrestler Navid Afkari to send to its own people an unmistakable message of intimidation that protests will not be tolerated. This reminded the world again that the greatest victims of the Islamic Republic of Iran are the Iranian people, who are increasingly standing up to the regime.

The United States has not stood by idly in the face of Iran's violence. Working with our partners and allies, we have redoubled our commitment to preserving peace and stability in the region. We have shown Iran that if it chooses to threaten American lives, President Trump will not hesitate to take decisive action. We have continued to strengthen and vigorously enforce our sanctions, making clear to Iran that its malign actions will only steel our resolve and increase the regime's economic and diplomatic isolation. Since our last report, several countries in Europe and South America have correctly declared Iran's proxy Hezbollah a terrorist organization. We invoked the "snapback" mechanism to restore nearly all UN sanctions on Iran. We continue to stand with the Iranian people, and have rolled out sanctions and visa restrictions on a host of Iranian officials directly responsible for the lethal crackdown in November 2019. Corrupt and repressive regime officials, not the Iranian people, are the targets of the Maximum Pressure Campaign.

The only path forward for Iran to secure relief from economic sanctions is to cease its destabilizing activity and behave like a normal nation. It is not too late for the Iranian regime to abandon its dangerous conduct in favor of a new path. Countries in the Middle East recognize the opportunity that peace and stability bring and so too should Iran. Israel, the United Arab Emirates, and Bahrain recently came together in the historic Abraham Accords because they understand cooperation and dialogue are the best ways to address shared challenges and bring prosperity to their people.

As President Trump has said, Iran is a country with enormous untapped potential. If Iran were to work alongside its neighbors to foster stability and welcome peace rather than drive conflict, the Iranian people would thrive and once again enjoy prosperity. I look forward to the day that all Iranians enjoy the freedom and dignity they so deeply deserve.

Michael R. Pompeo

SECRETARY OF STATE, UNITED STATES OF AMERICA

EXECUTIVE SUMMARY



AP PHOTO

The 2020 edition of the Outlaw Regime report documents the magnitude of the Islamic Republic of Iran's destructive activities at home and abroad. This report has been revised to include the range of destabilizing actions Iran has taken since October 2018, when we first released the Outlaw Regime report, contains a new chapter on Iran's Regional Destabilization, and includes many other updates. Some of the activities highlighted in this report have occurred recently, while others date back to the early days of the revolution. As this report makes clear, the one constant is that the Iranian regime will do whatever it takes to maintain its

grip on power and spread its violent, revolutionary ideology.

Since the establishment of the Islamic Republic, the regime has deployed a revolutionary ideology to justify the export of terrorism and instability throughout the Middle East. The primary tool to execute this hegemonic mission has been the Islamic Revolutionary Guard Corps (IRGC). The IRGC is the most powerful conglomerate in Iran, spreading and consolidating its control over much of Iranian life. As the Iranian government's primary means of directing and implementing its global expansionist campaign, the IRGC actively participates in, finances, and promotes terrorism as a tool of statecraft. In the past year alone, the IRGC naval forces have mined six commercial ships while its Aerospace Force has launched a complex missile attack against Saudi Arabian oil facilities and struck U.S. and Coalition forces on the frontline of the fight against the Islamic State of Iraq and Syria (ISIS). IRGC ground forces are deployed abroad to bolster the Assad regime, and its Basij paramilitary force is mobilized at home to surveil, harass, and kill ordinary Iranians. The IRGC Qods Force (IRGC-QF), whose activities have an extraterritorial focus, leads the Islamic Republic's destabilizing support for militias and terrorist groups, supplying arms, training, and operational guidance to armed groups across the region in order to exacerbate conflicts at the expense of local populations, deepening the cycle of violence and misery.

Chapter One underscores the regime's role as a persistent destabilizing force across the Middle East, detailing the aggressive actions taken by the Iranian regime and its partners and proxies. In September 2019 and January 2020 respectively, Iran conducted large scale conventional attacks on Saudi oil facilities and an Iraqi base hosting U.S. and coalition forces. In May and June 2019, Iran endangered the free flow of maritime commerce by conducting limpet mine attacks on six commercial vessels passing through the Strait of Hormuz and shot down a U.S. drone flying in international airspace. In July 2019, the IRGC Navy detained a British oil tanker and her crew, subjecting them to more than two months of captivity. Beyond actions by its own forces, Iran

has continued its longstanding practice of arming and training terrorists and militia groups throughout the Middle East, inflaming conflicts in Iraq, Syria, and Yemen and catalyzing increased instability and human suffering throughout the Middle East.

Chapter Two explores Iran's development of its ballistic missile program. Iran has the largest and most diverse ballistic missile force in the Middle East and is continuing to explore multiple pathways that would allow it to expand its longer-range missile capabilities and achieve greater precision. Recognizing this threat, the UN Security Council adopted UN Security Council Resolution (UNSCR) 1929 in 2010, which imposed tough limitations on Iran's proliferation activities. While Resolution 2231 replaced Resolution 1929 and weakened aspects of its binding limitations, Resolution 2231 nonetheless continues to call upon Iran not to undertake any activity related to ballistic missiles designed to be capable of delivering nuclear weapons — a clear signal of the international community's continued concern about Iran's behavior. In spite of these demands, Iran has continued to defy the provisions of UNSCR 2231, and its pace of missile launches and tests has not diminished since this resolution went into force in 2016.

Chapter Three recounts the long history of the Islamic Republic's support for terrorism, primarily driven by the IRGC. Since 1979, Iran has made it a policy of the state to actively direct, facilitate, and carry out terrorist activity globally. Unlike almost any other country, the Islamic Republic has supported terrorism as a method of asymmetric warfare via its own military and intelligence apparatuses: the IRGC-QF and the Ministry of Intelligence and Security (MOIS). Today, the IRGC-QF is active across the Middle East and has plotted or carried out terrorist attacks on five out of seven continents. Where it does not act directly, the Iranian regime has used partner and proxy groups such as Hizballah, Hamas, Palestine Islamic Jihad, the Bahraini Al-Ashtar Brigades, and the Iraqi Shia militia groups Kata'ib Hizballah and Asa'ib Ahl al-Haq to conduct attacks.

Chapter Four details the Islamic Republic's illicit financing activities, which undermine the integrity and security of the global financial system, yet are vital to the Iranian regime's destabilizing campaigns and the aggrandizement of its leaders. The Iranian regime uses opaque and fraudulent financing activities to fund its partners, proxies and proliferation activities. In the last year, the international community exposed the IRGC-QF's continued use of front companies and related individuals to move funds, procure restricted materials and technologies, exploit currency exchange networks in neighboring countries, and produce counterfeit currency. In February 2020, the Financial Action Task Force (FATF) called on all jurisdictions to impose effective countermeasures on Iran for its failure to implement basic international standards to combat money laundering and terrorist financing.

EXECUTIVE SUMMARY

Chapter Five outlines the most recent concerns with Iran’s nuclear program reported by the world’s independent nuclear verification authority, the International Atomic Energy Agency (IAEA), and puts those concerns in the context of Iran’s decades-long history of obstruction and noncompliance with its obligations under its IAEA safeguards agreement required under the Nuclear Non-Proliferation Treaty (NPT). In January 2019, the IAEA detected chemically-processed uranium particles at an undeclared location in Iran; the IAEA’s investigation into the source and origin of these particles is ongoing. To date, Iran has failed to fully address multiple separate questions raised by the IAEA about possible undeclared nuclear material and activities in Iran — including by refusing for many months the IAEA’s requests for access at two locations associated with those questions — which Iran is required to provide under its safeguards obligations. In 2020, the IAEA Board of Governors made an important rebuke of Iran’s actions by adopting a resolution calling on Iran to fully cooperate with the IAEA without further delay, including by providing prompt access to the locations specified by the IAEA. On August 26 2020 the IAEA Director General and Iran reached agreement on access to both locations, however critical questions about Iran’s implementation of its safeguards agreements still remain outstanding. The IAEA will continue to report on whether its initial questions have been addressed based on the information collected during these visits as well as its continued engagement with Iran.

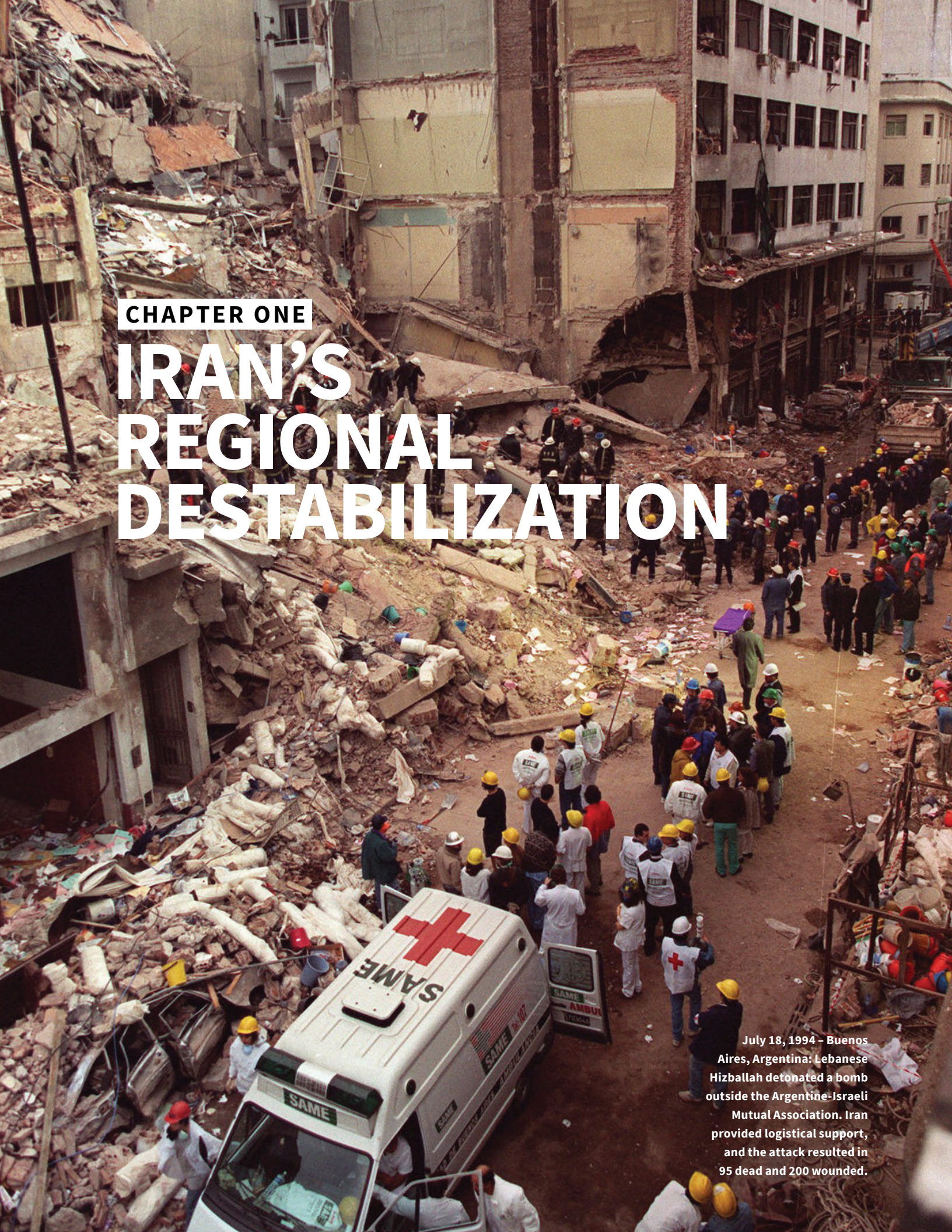
Together with Iran’s efforts to both preserve a vast archive of records from its past nuclear weapons program and maintain its former nuclear weapons scientists within a bureaucratic structure under military direction and headed by the past leader of that weapons program, Iran’s recent provocative steps to expand its uranium enrichment activities paint a very troubling picture of its nuclear program today and underline the importance of the international community reaching an enduring solution to the myriad problems Iran has presented since its covert nuclear program first came into public view in 2002.

Chapter Six documents the repeated and systemic deployment of human rights abuses by the Islamic Republic to suppress peaceful civil society activism and the demands of the Iranian people for democratic reforms. The Islamic Republic does not tolerate dissent of any kind and persecutes civil society activists, including labor rights leaders, and members of ethnic and religious minority groups. The regime also denies its citizens fair trial guarantees, regularly falling short of the standards provided by its own laws. Its prisons are notorious for mistreatment and torture, and it uses capital punishment on minors and for crimes that do not meet Iran’s international obligation to impose the

death penalty for only “the most serious crimes.” All of these issues were on full display when the Islamic Republic arrested, tortured, and ultimately executed champion wrestler Navid Afkari, all because he dared participate in a protest in 2018. Beyond its borders, the Islamic Republic and its partners and proxies have committed numerous human rights abuses, including targeting civilians in Syria and kidnapping Sunnis in Iraq.

Chapter Seven illustrates the spread of the Islamic Republic’s malign behavior in cyberspace. While the bulk of Iran’s malign cyber actions are against countries in the region, Iran has increasingly deployed this capability against a variety of U.S.-based entities including financial companies, universities, and critical energy infrastructure. Iran has used its cyber capabilities to identify and silence critics and spread its disinformation campaigns abroad. In the past year the regime has resorted to even more extreme measures, imposing an almost total internet shutdown and removing internet access for one week to nearly all of its 80 million people during nationwide protests in November 2019.

Chapter Eight highlights the enduring and increasingly irreversible tragedy of environmental degradation at the hands of the Islamic Republic’s self-serving leaders. Following decades of corruption and misguided policy, Iran is inching ever closer to an environmental crisis. The regime’s failure to respond to worsening environmental conditions has led to a significant depletion of Iran’s water resources and severe air pollution. Instead of addressing these existential issues, the Islamic Republic has brutally responded against those calling for reform.

An aerial photograph showing a massive pile of rubble and debris on the left side of a city street. The debris includes bricks, concrete blocks, and twisted metal. On the right, a multi-story building has been severely damaged, with its facade partially missing, revealing the internal structure. A large number of people, many wearing hard hats and safety vests, are gathered on the street, engaged in rescue or cleanup work. In the foreground, a white ambulance with a red cross and the word 'SAME' is parked. The scene is one of significant destruction and emergency response.

CHAPTER ONE

IRAN'S REGIONAL DESTABILIZATION

July 18, 1994 – Buenos Aires, Argentina: Lebanese Hizballah detonated a bomb outside the Argentine-Israeli Mutual Association. Iran provided logistical support, and the attack resulted in 95 dead and 200 wounded.

“THIS IS AN ATTACK OF A SCALE WE’VE JUST NOT SEEN BEFORE. THE SAUDIS WERE THE NATION THAT WERE ATTACKED. IT WAS ON THEIR SOIL. IT WAS AN ACT OF WAR AGAINST THEM DIRECTLY.”

U.S. SECRETARY OF STATE MICHAEL R. POMPEO, SEPTEMBER 18, 2019

INTRODUCTION

Since its founding in 1979, the Islamic Republic has acted as a destabilizing force in the Middle East, instigating and inflaming conflict in an attempt to assert itself as the region’s dominant power and export its authoritarian system of government. In the past year alone, Iran has launched an attack from its territory against civilian oil facilities in Saudi Arabia and used its ballistic missiles against an Iraqi base hosting U.S. and Coalition forces on the frontlines of the fight against ISIS. At sea, Iran continues to pose a major threat to freedom of navigation and maritime security. Since 2019, the Iranian regime has mined six commercial vessels, shot down a U.S. unmanned aerial vehicle (UAV) flying in international airspace, and unjustifiably detained a British tanker and her crew for more than two months. In addition to these actions, the regime has continued its longstanding practice of funneling weapons, personnel, and finances to partners and proxies throughout the region, needlessly prolonging and exacerbating conflicts from Syria to Yemen.

MISSILE STRIKES IN SAUDI ARABIA AND IRAQ

On September 14, 2019, Iran launched, from its own soil, a combination of at least 25 land attack cruise missiles (LACMs) and unmanned aerial vehicles (UAVs), striking Saudi Arabian oil processing facilities in Abqaiq and Khurais. The attack temporarily shut down approximately half of Saudi Arabia’s oil production capacity. Although the Houthis initially claimed responsibility for the strike, a panel of United Nations experts rejected the Houthi claim. Careful analysis clearly revealed that the attack originated in Iran. The impact points on the Saudi facilities show that the attack originated from the northwest, not the south as would be expected from an attack originating in Yemen. The distance of the targets exceeds the estimated range of weapons in the Houthi arsenal. The size and complexity of the attack required an operational capability that the Houthis have never demonstrated, before or since. Finally, there is no history of the Iranian produced UAVs used in the attack ever being deployed or possessed by the Houthis. The overwhelming evidence against Houthi involvement has resulted in widespread condemnation of Iran for the attack. Days after the attack, Saudi Arabia’s Ministry of Defense stated that the weapons used in the attack were of Iranian origin, and on September 24, the

United Kingdom, France, and Germany issued a joint statement condemning the attack and attributing it to Iran.

On January 7, 2020, Iran again used its missile force to launch more than a dozen ballistic missiles at U.S. and Coalition forces stationed at Ain Al-Assad Air Base in Iraq. Although the strike did not result in any deaths, more than one hundred U.S. servicemen suffered traumatic brain injuries due to the attack. Moreover, multiple DoD personnel have provided their assessment that the lack of casualties was due to the base's early warning system and good fortune rather than Iranian intentions. In contrast to the attack on Saudi Arabia, Islamic Revolutionary Guard Corps (IRGC) Aerospace Force Commander Amir Ali Hajizadeh immediately claimed credit for



Lebanese Hizballah fighters parade during a ceremony in south Lebanon.

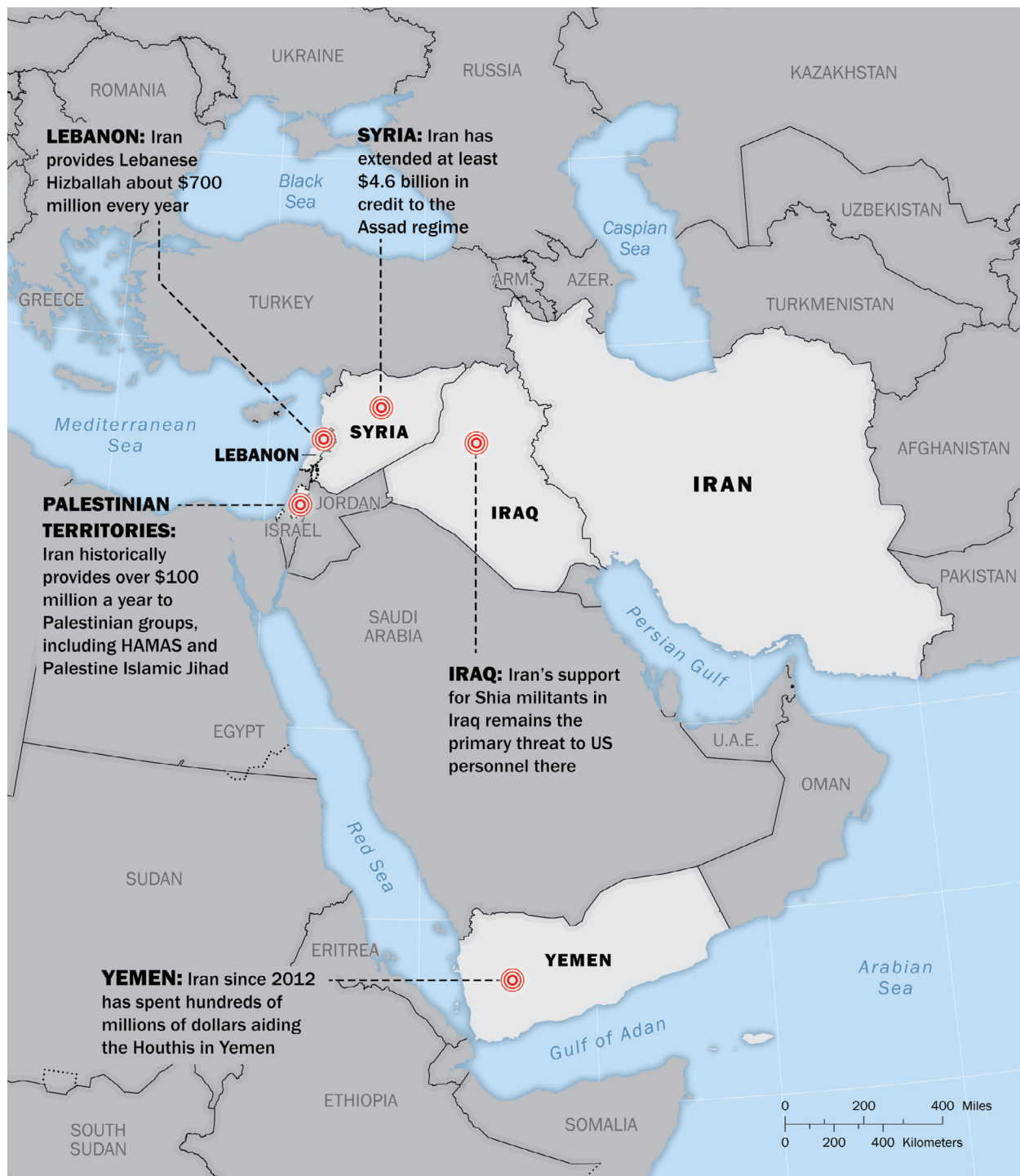
the attack, boasting of the strike's success and noting that Iran could easily have caused "4,000 or 5,000" deaths.

PARTNERS AND PROXIES: INFLAMING REGIONAL CONFLICTS

Through the IRGC, Iran has provided advisors, training, technology, and weapons to a variety of armed groups across the region, all of whom continue to use those capabilities to attack and threaten people across the region. Iranian lethal aid to these groups includes small arms, ammunition, explosives, improvised explosive devices (IEDs), explosively formed penetrators (EFPs), vehicles, anti-tank guided missiles (ATGMs), man-portable air defense systems (MANPADs), artillery, rockets, UAVs, Anti-Ship Cruise Missiles (ASCMs), and ballistic missiles.

Iraq

In Iraq, Iran has maintained decades-long relationships with a variety of Shia militant groups (SMGs), many of whom have deployed Iranian weapons against U.S. military personnel. Since the fall of 2019, U.S. and Coalition forces stationed in Iraq to fight ISIS have come under multiple rocket attacks, two of which have resulted in American fatalities. Iran's closest and most capable partner armed group in Iraq, Kata'ib Hizballah, executed a rocket attack with a barrage of over 30 rockets at an Iraqi military facility in Kirkuk on December 27, resulting in the death of an American contractor. Iranian-backed SMGs struck again on March 11, launching a rocket barrage against Camp Taji, killing one British and two U.S. service members as well as wounding eleven others.



Since 2012, Iran has spent over **\$16 billion** propping up the Assad regime and supporting its other partners and proxies in Syria, Iraq, and Yemen.

Lebanon

In Lebanon, Iranian support has been foundational to Hizballah since its emergence in the 1980s



Secretary Pompeo ✓
@SecPompeo

FACT: [#Iran](#)'s regime punished Palestinians by providing them just \$20,000 — yes, \$20,000 — via [#UNWRA](#) from 2008 to 2017.

8:23 PM - 7 Sep 2018

as the first organization to employ the widespread and regular use of suicide bombers. In addition to providing as much as \$700 million in funds annually, Iran has long been one of the primary suppliers of Hizballah's military technology, enabling the group's transformation into a quasi-conventional force. This support violates UNSCR 1701, adopted in 2006, which obligates all UN

Member States to prevent the sale or supply to any individual or entity in Lebanon of arms and related materiel, except those authorized by the Government of Lebanon or the United Nations Interim Force in Lebanon. As part of this larger picture, Iran has continued to support Hizballah's development of missile production facilities, as well as the group's ongoing efforts to convert its 130,000-plus rocket stockpile into precision guided missiles. Hizballah poses a growing threat to both Lebanese and regional stability, as demonstrated in September 2019 when the group used a number of Anti-Tank Guided Missiles to target an Israeli army base and military vehicles located inside Israeli territory.

Syria

Iran has been the Assad regime's most reliable partner over nearly a decade of involvement in the Syrian conflict, propping up the Syrian regime and extending Assad almost \$5 billion in lines of credit and more than \$10 billion in funding since 2012. Tehran has deployed thousands of soldiers on the ground—including both their conventional army (Artesh) and IRGC Ground Forces—while managing militia groups of as many as 10,000 Iraqi, Afghan, and Pakistani Shi'a fighters in Syria. Iran's support for the Assad regime has been constant even in the face of the regime's egregious use of chemical weapons and attacks killing civilians and destroying civilian infrastructure such as hospitals and schools. In addition to IRGC and Artesh fighters, Iran's oldest partner in the region, Hizballah, has been particularly active in Syria during the conflict, sending fighters and commanding militia forces to bolster the regime against opposition forces.

As the unresolved Syrian conflict demonstrates, ISIS and Iran's Shia militia proxies fed off each other and exploited conditions to strengthen their grip on societies. Iranian malign activities, and its influence in Damascus, fueled the emergence of ISIS and, in turn, capitalized on the cycle of violence that ISIS caused. Vulnerable Shia and Alawi populations, under pressure from ISIS, welcomed the security of Shia militias supported by Iran. The grave abuses of Iranian-backed Shia militia and

Assad's forces, in turn, convinced vulnerable Sunni populations that ISIS protection was their only recourse. Finally, Iran exploited the fight against ISIS and the elimination of the ISIS territorial caliphate to expand and deepen its influence and advance its hostile and hegemonic goals. Iranian malign influence and activities in Syria, coupled with the failure of the Assad regime to secure and serve the Syria people, have ensured that the grievances that ISIS exploited have not been resolved and have only deepened, thereby enabling the regeneration of ISIS.

Yemen

Iran has sought to prolong the conflict to challenge its main regional rival, Saudi Arabia. Iran has spent hundreds of millions of dollars assisting the Houthis and has provided a broad spectrum of lethal aid, including ballistic missiles, UAVs, and explosive boat technology, in violation of UN Security Council Resolution 2216, which prohibits the supply or sale of arms and related materials to the Houthis. U.S. naval forces have interdicted multiple shipments of Iranian weapons bound for the Houthis in Yemen. The most recent interdictions in November 2019 and February 2020 uncovered over 150 anti-tank guided missiles (ATGMs), explosive boat components, surface-to-air missiles, and land attack cruise missile and UAV components, among other forms of lethal assistance.

Iranian supported UAV and missile attacks from Yemen have undermined peace efforts and have threatened to escalate the conflict even further. In recent years, the Houthis, enabled by IRGC advisors, have conducted multiple long-range missile and UAV strikes on both Saudi Arabia's Yanbu port and capital city of Riyadh using versions of the Iranian Qiam ballistic missile. The Iranian hand in these recent attacks is evident in recovered missile debris from several attacks that are unique to Iranian missiles, including components stamped with a logo signifying the letters SBI, used by the Iranian company Shahid Bagheri Industries.

Palestinian Territories

Iran has historically provided up to \$100 million annually in combined support to Palestinian terrorist groups, including Hamas, Palestinian Islamic Jihad (PIJ), and the Popular Front for the Liberation of Palestine-General Command. These terrorist groups have been behind a number of deadly attacks originating from Gaza, the West Bank, Syria, and Lebanon, including attacks against Israeli civilians, Egyptian security forces in the Sinai Peninsula, and American citizens. Iran's support for Palestinian terrorist groups serves only to further its own strategic interests



AP PHOTO

and threaten our partner and ally Israel while coming at a high cost to the Palestinian people. As the regime prioritizes funding for Palestinian terror groups, it falls well short of living up to its self-professed obligation of directly supporting the Palestinian people. In the last ten years, Iran has provided only \$20,000 to the United Nations Relief and Works Agency (UNRWA). This pales in comparison to the nearly \$3 billion provided to UNRWA by the U.S during this period, as well as the almost \$2 billion provided by the EU and the more than \$600 million provided by Saudi Arabia.

MARITIME SECURITY: ESCALATING VIOLENCE AT SEA

The Islamic Republic poses a major threat to the exercise of navigational rights and freedoms and maritime security from the Persian Gulf to the Red Sea. Since 2019, the Iranian regime has mined six commercial vessels, shot down a U.S. UAV lawfully operating over the Persian Gulf, and illegally detained a British tanker and her crew without justification for more than two months. Iranian officials, including high-level IRGC commanders, have repeatedly threatened to close the Strait of Hormuz, the narrow waterway between the Persian Gulf and the Arabian Sea through which 20 percent of global petroleum shipments pass.

The Islamic Revolutionary Guard Corps Navy (IRGCN) operates hundreds of small speedboats typically armed with Anti-Ship Cruise Missiles (ASCMs), torpedoes, and naval mines, representing



IRGC personnel mined the Norwegian owned vessel *Front Altair* while it transited the Gulf of Oman on June 13th, 2019.

a persistent threat to freedom of navigation and maritime security. Iran's threat to the free flow of commerce manifested itself in May and June of 2019, when IRGCN personnel placed and detonated limpet mines on six commercial vessels. On May 12 two Saudi-, one UAE-, and one Norwegian-flagged ships were damaged after limpet mines detonated on their hulls while harboring in UAE territorial waters off Fujairah. Barely a month later on June 13, IRGCN personnel mined one Japanese and one Norwegian-owned ship while the vessels transited the Gulf of Oman. Although Iran denied conducting these attacks, U.S. armed forces later released a video showing an IRGCN small boat removing an unexploded Iranian limpet mine from the side of the Japanese tanker. Soon after the second limpet mine attack, on June 19 the IRGC used a surface-to-air missile to shoot down a U.S. UAV transiting the Strait of Hormuz. Undergirding all of Iran's specific acts of violence is the IRGCN's consistently unsafe and unprofessional conduct, having for years deployed its small attack boats to harass U.S. naval vessels. The U.S. Navy has recorded dozens of dangerous interactions with IRGCN vessels in recent years, most recently in April 2020, when a swarm of IRGC fast boats disrupted a routine exercise of five U.S. naval vessels by engaging in high speed, provocative approaches.

By providing weapons, training, and advisors to the Houthis in Yemen, Iran has expanded its reach beyond the Persian Gulf to the Red Sea. With Iranian support, the Houthis have executed a number of attacks on commercial and military vessels, threatening the free flow of commerce through another maritime chokepoint, the Bab al-Mandeb Strait. In October 2016, the Houthis fired Anti-Ship Cruise Missiles at U.S. warships in international waters just north of the Bab-al-Mandeb. The attacks came just one week after militants struck and disabled the Swift, an Emirati transport vessel. In January 2017, the Houthis were responsible for launching a remotely-detonated marine craft that attacked the Saudi Royal Navy frigate Al Madinah. The U.S. Navy determined that the IRGC likely provided the craft. Since then, the Houthis have continued to threaten and carry out attacks against Saudi commercial vessels, including a July 2018 attack on a Saudi tanker in the Red Sea. The Houthis have also emplaced naval mines near commercial shipping routes in the Red Sea, threatening the exercise of navigational rights and freedoms and the free flow of commerce in the region.

UNJUSTIFIED DETENTION OF SAILORS AT SEA

Since its founding, the Islamic Republic has frequently resorted to kidnapping and wrongful detentions for political gain, a pattern of behavior that has also played out at sea. A obvious example of this was the IRGC Navy's July 19, 2019 seizure of the British-flagged, Swedish-owned Stena Impero tanker while it was transiting the Strait of Hormuz. Iran ultimately detained the Stena Impero for over two months, using the ship's crew as leverage to secure the release of the Adrian Darya, an Iranian oil tanker that had been detained by Gibraltar authorities on July 4 that same year due to credible suspicion that

the ship was transporting Iranian oil to Syria in violation of EU sanctions. Once Gibraltar's authorities released the *Adrian Darya*, the ship immediately set sail for Syria's western coast and, via ship-to-ship transfer, illegally delivered over two million barrels of Iranian crude directly to the Assad regime.

Another example is the IRGCN's January 2016 seizure of two U.S. Navy riverine boats. Iranian authorities, claiming the vessels illegally strayed into Iranian waters following engine failure, detained ten U.S. sailors for a period of 15 hours. A Department of Defense investigation later concluded that Iran violated international law by impeding the boats' exercise of the right of innocent passage. The investigation also determined that Iran violated the sovereign immunity of a U.S. vessel by boarding, searching, and seizing the boats, and by taking photographs and video recordings of the crew.



Iran's Islamic Revolutionary Guards Corps Navy seized Maersk Tigris cargo ship and held the vessel for a week.



CHAPTER TWO

IRAN'S MISSILE PROGRAMS

Iran launches an Emad long-range ballistic surface-to-surface missile.

“Iran’s pace of missile launches did not diminish after JCPOA Implementation Day in January 2016, and Iran continues to prioritize its missile force development. Iran has conducted multiple ballistic missile launches since that time.”

SPECIAL REPRESENTATIVE FOR IRAN BRIAN H. HOOK, SEPTEMBER 2018

INTRODUCTION

Iran’s development and proliferation of ballistic missiles poses a critical threat to regional security and remains a significant challenge to global nonproliferation efforts. This is evident not only in Iran’s continued expansion and refinement of its ballistic missile capabilities, but also in its reckless proliferation of missile components and technology to others, including the Houthis in Yemen and Lebanese Hizballah in violation of UN Security Council resolutions. In addition to activities in which the regime has attempted to avoid attribution, the Iranian regime’s threat to regional security is evident in its operational use of ballistic missiles in open attacks against U.S. service members in Iraq in 2020 and targets in Iraq and Syria in 2018, and its employment of land attack cruise missiles against Saudi refineries in September 2019.

Iran’s missile development activities have been a concern of the UN Security Council for more than a decade. Adopted in 2010, UN Security Council Resolution (UNSCR) 1929 demonstrated the international community’s longstanding concern with Iran’s activities, affirmed prior resolutions restricting Iran’s missile program, and placed tough limitations on its ballistic missile program. The resolution prohibited Iran from undertaking any activity related to ballistic missiles capable of delivering nuclear weapons, recognizing that such missiles would likely be Iran’s preferred method of delivering a warhead in the future.

In 2015, UNSCR 2231 replaced UNSCR 1929 and weakened aspects of its binding provision on Iranian missile launches as part of the implementation of the Joint Comprehensive Plan of Action (JCPOA). UNSCR 2231, however, continues to call upon Iran not to undertake any activity related to ballistic missiles designed to be capable of delivering nuclear weapons—a clear signal of the international community’s continued concern about Iran’s missile program. Adherents of the JCPOA wishfully assumed that the deal would engender a positive change in the Iranian regime’s behavior and that the deal would beget further deals. Those assumptions were invalid. Since 2015, Iran has brazenly continued to defy the will of the international community as it pushes ahead with its missile programs.

IRAN'S MISSILE FORCE: A GROWING THREAT

Iran has the largest and most diverse missile force in the Middle East, with more than 10 types of ballistic missiles either in its inventory or in development. The regime continues to deploy a range of solid- and liquid-propellant short-range and medium-range systems and is exploring multiple pathways that would allow it to expand its longer-range missile capabilities and greatly enhance precision. In its recent military parades, Iran has exhibited the variety of missiles in its arsenal, displaying systems such as the Zolfaghar short-range ballistic missile (SRBM), Qiam SRBM, Shahab-3 medium-range ballistic missile (MRBM), the precision-strike Emad MRBMs, Sejil MRBMs, and Khorramshar MRBM. In October 2019, Iran publicly unveiled upgrade kits designed to convert artillery rockets, including the Zeizal 610mm diameter heavy rocket, into steerable, surface-to-surface, precision missiles.

Iran also continues to develop new missiles, as shown by its 2019 unveiling of a new land attack cruise missile system known as the Hoveizeh that it claims has a range of 1,300 kilometers, as well as a new solid-propellant ballistic missile called the Dezful that allegedly has a 1,000-kilometer range. Iran continues to prioritize its missile force development, routinely conducting ballistic missile launches since the JCPOA went into effect. Such tests have not only defied the provisions of UNSCR 2231, they have supported the continued expansion of Iran's missile capabilities and increased the lethality of Iran's arsenal. Iran engaged in numerous missile launches between 2010 and 2015 in violation of UNSCR 1929 and, since 2016, in defiance of UNSCR 2231. Since 2016, Iran has conducted a number of tests on a variety of missile systems including the Khorramshahr, Shahab, Qiam, and Zolfaghar ballistic missiles, all of which are Missile Technology Control Regime (MTCR) Category I systems (e.g., capable of delivering at least a 500 kilogram payload to a range of at least 300 kilometers) and therefore are inherently capable of carrying nuclear warheads. Many of these launches have been catalogued by the United States, the United Kingdom, France, Germany, and Israel in letters to the Security Council, as summarized in reports of the Secretary-General on the implementation of UNSCR 2231.

Iran has also continued to develop many of the technologies needed to develop longer-range missile systems through its space launch vehicle (SLV) program. SLVs use technologies that are virtually identical and interchangeable with those used in ballistic missiles. For this reason, Iran's ongoing SLV development efforts pose a particular concern, as they allow Iran to gain experience with various technologies applicable to longer-range systems under the guise of a peaceful space program. SLV development has been a priority for Iran, shown by its unsuccessful attempts on three occasions in 2019 to place a satellite into orbit using its Simorgh and Safir SLVs. Thus far in 2020, Iran conducted a test of its Simorgh SLV in February, and most recently, in April, Iran's



Recovered segments of an Iranian missile.

IRGC conducted a space launch from a mobile system that it claimed placed a military satellite into orbit, contradicting their previous claims that they did not have a military space program. As with Iran's ballistic missile launches, its SLV tests have been condemned at the Security Council by the United States, as well as by France, Germany, the United Kingdom, and Israel as in defiance of UNSCR 2231.

ADDRESSING THE THREAT

The United States employs a wide range of tools to address this problem. On the multilateral front, we work with partners to interdict missile-related transfers to Iran and to disrupt Iranian missile proliferation activities in third countries. The United States and many of its closest partners participate in the Missile Technology Control Regime and the Hague Code of Conduct Against Ballistic Missile Proliferation, where we use our participation to raise awareness of Iran's missile development program, chokepoint technologies, and procurement strategies, as well as to press countries to take steps to impede Iran's acquisition of missile technology. The United States also reviews thousands of visas annually to ensure that students, researchers, and other foreign visitors are not evading export controls and acquiring technological know-how that could benefit Iran's missile programs.

The United States and its partners also sanction entities who knowingly supply technology to Iran's missile program. Since the beginning of 2017, the United States imposed sanctions on a total of thirty-three foreign entities, mostly in China, for transferring equipment to Iran's missile program. The United States has also designated a number of Iranian targets including multiple missile-related entities and individuals associated with Iran's Organization of Defensive Innovation and Research (SPND), which played a central role in the Iranian regime's past nuclear weapons effort; the Iran Space Agency, which develops SLV technology; the Iran Space Research Center, which has worked with the UN-designated ballistic missile organization Shahid Hemmat Industrial Group on several projects; and the Iranian Astronautics Research Institute which managed the Kavoshgar project, which launched the Safir SLV. The United States also has designated Iran's Mahan Air, the Islamic Republic of Iran Shipping Lines (IRISL), and a China-based IRISL subsidiary -- all of whom have transported UN-restricted missile items to Iran.

The United States will continue to aggressively implement and enforce sanctions with respect to Iran's missile program until the Iranian regime agrees to abandon its nuclear ambitions as part of a new, comprehensive deal.

CHAPTER THREE

IRAN'S SUPPORT FOR TERRORISM



“The bet that the JCPOA would increase Middle East stability was a bad one for America, for Europe, for the Middle East, and indeed for the entire world.”

U.S. SECRETARY OF STATE MICHAEL R. POMPEO, MAY 2018

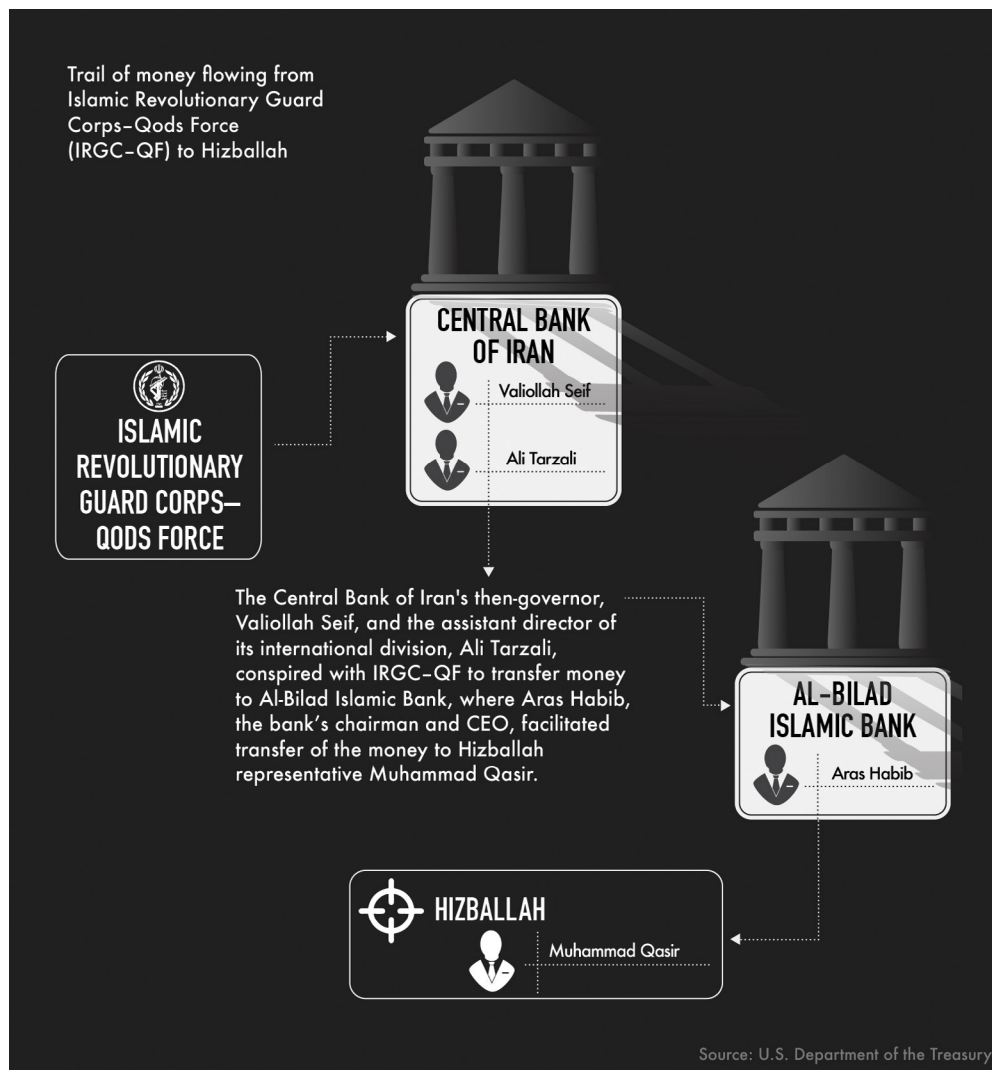
INTRODUCTION

Since 1979, Islamic Republic of Iran has made it a policy of state to actively direct, facilitate, and carry out terrorist activity globally. Designated a State Sponsor of Terrorism since January 19, 1984, the Islamic Republic has supported terrorism using its own military and intelligence apparatuses unlike almost any other country. On April 15, 2019, the United States designated the Islamic Revolutionary Guard Corps (IRGC) in its entirety, including its Qods Force (IRGC-QF), as a Foreign Terrorist Organization (FTO). The designation was the first time that the United States has ever named a part of another government as an FTO. The IRGC FTO designation highlights that Iran is an outlaw regime that uses terrorism as a key tool of statecraft.

Through the IRGC-QF and the Ministry of Intelligence and Security (MOIS), Iran conducts attacks, assassinations, and supports terrorist plotting. As outlined in the chapter in proxies, terrorist groups such as Hizballah and the Palestinian Islamic Jihad (PIJ) have frequently received from the IRGC-QF the training, weapons, and financing needed to conduct acts of terrorism. In addition to conducting intelligence collection and clandestine operations outside Iran, MOIS operatives also have a history of conducting and enabling acts of terrorism across the globe, often abusing diplomatic cover. In July 2018, authorities across Europe foiled an MOIS terror plot to detonate an explosive device at a political rally outside of Paris. Several months later in October 2018, authorities in Denmark disrupted an Iranian assassination plot targeting Iranian opposition figures there. In November 2019, Iranian agents assassinated a dissident Iranian journalist living in Turkey. Where it does not act directly, the Iranian regime has mastered the use of terrorist partner and proxy groups to conduct attacks, often through unconventional means. Unlike non-state terrorist groups such as ISIS and al-Qa’ida, Iran prioritizes deniability and obscures its role in terrorist activities. But the evidence is clear: Iran remains the world’s leading state sponsor of terrorism.

IRAN-BACKED TERRORIST GROUPS

Through the IRGC-QF, Iran supports several U.S.-designated terrorist groups, providing funding, training, weapons, and equipment. Among the groups receiving support from Iran are Lebanese Hizballah, Hamas, Palestinian Islamic Jihad (PIJ), Kata’ib Hizballah (KH) and Asa’ib



Ahl al-Haq (AAH) in Iraq, and the Al-Ashtar Brigades (AAB) in Bahrain. The Iranian regime has also facilitated travel by senior leaders of some of these groups to Iran, often under the guise of religious education.

Lebanese Hizballah is Iran's most powerful terrorist partner. Over the last decade, it has demonstrated its far-reaching terrorist and military capabilities. Above and beyond its shipments of weapons, Iran's annual direct financial backing to Lebanese Hizballah – which in recent years has totaled a staggering \$700 million per year – accounts for the overwhelming majority of the group's annual budget. Since its successful 2012 attack in Bulgaria, Hizballah has conducted terrorist plotting on five continents, with plots disrupted in Azerbaijan, Cyprus, Guinea, Kuwait, Nigeria, Panama, Peru, Thailand, the United Kingdom, and the United States, among others.

In addition to its support of proxies and terrorist groups abroad, terrorists also continue to reside within Iran's own borders where they have a haven. Al-Qa'ida (AQ) operatives continue to reside in Iran, where they have been able to move money and fighters to South Asia and Syria from sanctuary. In 2016, the U.S. Treasury Department identified and sanctioned three senior AQ operatives residing in Iran.

UNCONVENTIONAL TACTICS

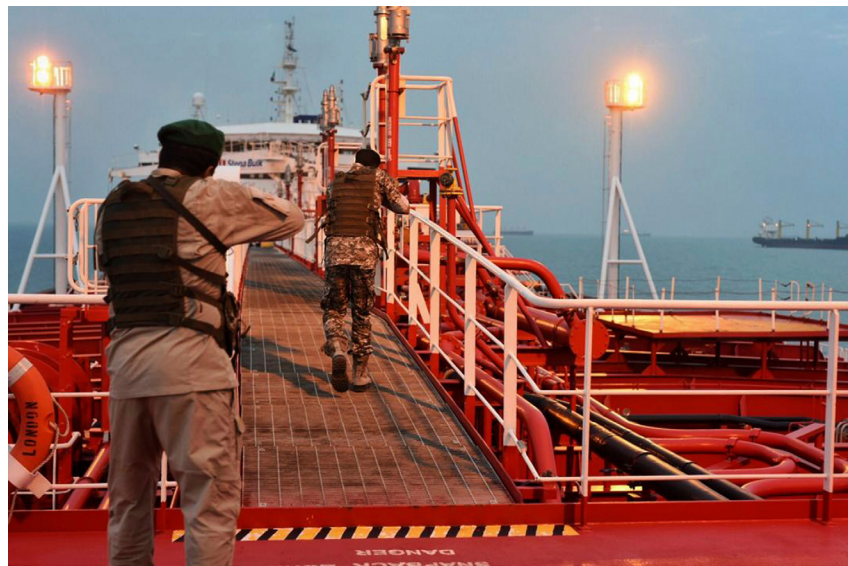
As the Islamic Republic stokes conflicts in the Middle East, it frequently turns to unconventional tactics to sustain and assist its partners and proxies. This includes the coercion and bribery of foreign officials, the facilitation of foreign fighters, use of child soldiers in hostilities, and misuse of civilian and commercial airlines to facilitate malign military activity.

The IRGC recruits foreign fighters to increase its influence abroad. The IRGC created the Fatemiyoun Division of Afghan Shia and the Zainabiyoun Brigade of Pakistani Shia to fight in regional conflicts, most notably in Syria. The U.S. government designated both groups for support for terrorism in 2019. West Point's Combatting Terrorism Center reports the size of the Fatemiyoun Division is between 10,000 and 12,000 soldiers, while a Fatemiyoun official in Iran stated in January 2018 that over 2,000 militiamen had been killed in Syria. In 2018, Human Rights Watch documented and condemned the IRGC's practice of recruiting child soldiers for the Fatemiyoun, uncovering evidence that Afghans as young as 14 have died in combat in Syria. Following a full assessment of Iranian activities, the U.S. Department of State listed Iran under the Child Soldiers Prevention Act for the first time in 2018, and the Department of State listed Iran again in 2019.

Multiple organizations continue to document the IRGC's tactic of coercing Afghan migrants to serve as foreign fighters. Human Rights Watch interviewed more than two dozen Fatemiyoun, reporting that "some said they or their relatives had been coerced to fight in Syria and either had later fled and reached Greece, or had been deported to Afghanistan for refusing. One 17-year-old said he had been forced to fight without being given the opportunity to refuse." A New York Times interview with Fatemiyoun stressed that the Afghans were frequently used as the "first wave" of fighters, resulting in higher casualty rates among their brigades, and that the IRGC would send the Fatemiyoun "to fight the most difficult battles." IranWire reported in an April 2020 interview with former Afghan child soldiers, who were 17 and 15 years old when recruited in Tehran, that they were dispatched for fighting in Syria multiple times to

fight alongside President Bashar Al-Assad's forces and received a three-week training in guerrilla warfare tactics by the IRGC in Yazd prior to their tours. The former child soldiers said Pakistani Shia also were a part of the 80 fighters receiving training in Yazd at the time.

The Iranian government also exports its destructive behavior by harnessing the global reach of civil and commercial aviation. Mahan Air, Caspian Air, Meraj Air, Pouya Air, and Qeshm Fars Air have all been implicated in supporting the IRGC and its partners and proxies. The egregious use of Mahan Air to support the IRGC-QF, including with respect to Iranian proxies, threatens regional stability and the safety and security of international civil aviation, which is why the entity was sanctioned by the U.S. Government in 2011. Mahan Air has been implicated in the transport of IRGC-QF operatives, weapons, equipment, and funds in support of the regime's campaigns abroad. It has shuttled IRGC-QF and proxy personnel to the frontlines of conflicts, including in Syria, where they engage in military training and fighting. The airline has also provided private transportation to senior IRGC-QF officials like former Qods Force commander Qassem Soleimani, allowing them to bypass UN-mandated travel restrictions as well as normal security and manifest procedures in contravention of international standards of aviation security. Mahan is also being used to support the illegitimate Maduro regime in Venezuela. Following the declaration of the coronavirus pandemic, Mahan Air's continued flights to China, Syria, and Lebanon contributed to the spread of the deadly virus.



IRANIAN-SUPPORTED TERRORIST PLOTTING, ASSASSINATIONS, AND ATTACKS WORLDWIDE

Although the Middle East bears the brunt of the consequences, Iranian-sponsored terrorist activity is a global problem. Since the Iranian regime seized power in 1979, Iran has planned and executed terrorist plots, assassinations, and attacks in more than 35 countries worldwide, primarily through the IRGC-QF and MOIS but also via its partner Lebanese Hizballah.

Iran's terrorist activities are on the rise. After a brief lull in the 1990s and early 2000s, Iran has ramped up its active involvement in worldwide terrorist activities, with numerous terrorist operations uncovered or disrupted in Europe, North and South America, Africa, and Asia since 2009. The pace of these activities indicates that Iran remains committed to using terrorism, violence, and coercion to achieve its objectives and is confident in its ability to operate anywhere in the world.

EUROPE

January 2020 – Albania

Albania expels two more Iranian diplomats for “activities incompatible with their diplomatic status”

November 2019 – Turkey

Massoud Molavi, who ran an opposition social media site, is assassinated Iranian Operatives

December 2018 – Albania

Albania expels the Iranian ambassador and another diplomat for “damaging [Albania’s] national security”

October 2018 – Denmark

Authorities in Denmark disrupt an Iranian plot to assassinate Iranian opposition figures

June 2018 – Belgium, France, Germany

Authorities in Belgium, France, and Germany arrest several Iranian operatives, including MOIS operatives assigned as diplomats to the Iranian embassy in Vienna, in a plot to plant a bomb to disrupt a political rally in Paris, France.

March 2018 – Albania

Albanian authorities detain and deport two Iranian operatives for plotting terrorist activities against members of the Mujahedin e-Khalq

November 2017 – Netherlands

An Iranian dissident is assassinated in The Hague

2016-2018 – Germany

German authorities search the homes and offices of 10 suspected IRGC-QF operatives in early 2018. In 2016, German authorities convicts an IRGC-QF operative for spying on the ex-head of a German-Israeli group and people close to him.

December 2015 – Netherlands

An Iranian dissident is assassinated in the city of Almere

2013 – Bosnia and Herzegovina

Two Iranian diplomats are discovered to be Iranian intelligence officers and expelled for espionage and connections to terrorism.

2012 – Turkey

Four IRGC-QF operatives enter Turkey to attack Israeli targets; the attack is disrupted by Turkish authorities.

July 2012 – Sofia, Bulgaria

An Iranian operative is arrested by Bulgarian authorities for surveilling a synagogue.

September 17, 1992 – Berlin, Germany

Hizballah – with Iran’s logistical support – assassinates four Iranian Kurdish dissidents in a small-arms attack at a café. Four operatives are tried and convicted in 1997.

August 6, 1991 – Suresnes, France

Iranian operatives assassinate former Iranian Prime Minister Shahpour Bakhtiar, who led an anti-Iranian regime movement. One operative is convicted, but two flee.

July 13, 1989 – Vienna, Austria

Iranian operatives assassinate the head of an Iranian Kurdish dissident group and two others.

December 1985-September 1986 – Paris, France

Hizballah bombs a number of soft targets. Iran provides logistical support, and the attack results in twelve dead and at least 200 wounded.

June 14-30, 1985 – Athens, Greece

Hizballah – with Iran’s logistical support – hijacks TWA flight 847 and kills a U.S. Navy diver.

AFRICA

November 2016 – Kenya

Two Iranian operatives and their Kenyan driver, who is employed by the Iranian embassy, are arrested and charged with information collection in connection with a terrorist act after surveilling the Israeli embassy.

February 20, 2013 – Nigeria

Three Iranian operatives are arrested for planning attacks against U.S. and Israeli tourist sites and organizations. A terrorist cell leader had received weapons training in Iran.

June 2012 – Nairobi, Kenya

Two IRGC-QF operatives are arrested for planning bomb attacks against Western interests. Authorities discover thirty-three pounds of explosive materials.

October 2010 – Nigeria

Nigerian authorities seize an Iranian shipment of rockets, rocket launchers, grenades, and ammunition destined for rebels in the Gambia and Senegal.

NORTH AMERICA

August 20, 2018 – United States:

Two Iranian operatives are charged for conducting covert surveillance of Israeli and Jewish facilities in the United States, and collecting identifying information about U.S. citizens and U.S. nationals who are members of an Iranian opposition group.

September 29, 2011 – Washington, DC, United States:

The IRGC-QF supports a plan to bomb a restaurant to assassinate the Saudi Ambassador to the United States.

September 2009 – Glendora, CA, United States:

An Iranian operative hires a hitman to assassinate a regime opponent .

July 22, 1980 – Bethesda, MD, United States:

An Iranian operative assassinates a former Iranian diplomat-in-exile, Ali Akbar Tabatabai, a

vocal critic of then-Iranian Supreme Leader Ayatollah Ruhollah Khomeini.

SOUTH AMERICA

January 8, 2015 – Montevideo, Uruguay:

A senior Iranian diplomat is expelled for planning an attack near the Israeli Embassy.

July 18, 1994 – Buenos Aires, Argentina:

Hizballah detonates a vehicle-borne improvised explosive device (VBIED) outside the Argentine-Israeli Mutual Association. Iran had provided logistical support, and the attack results in 85 dead and over 300 wounded.

March 17, 1992 – Buenos Aires, Argentina:

Hizballah detonates a VBIED outside the Israeli Embassy. Iran had provided logistical support. The attack kills twenty-nine people and wounded 242.

ASIA

February 2016 – Manila, Philippines

Philippine authorities thwart an Iranian plot to hijack a Saudi Arabian civilian aircraft.

April 13, 2013 – Kathmandu, Nepal

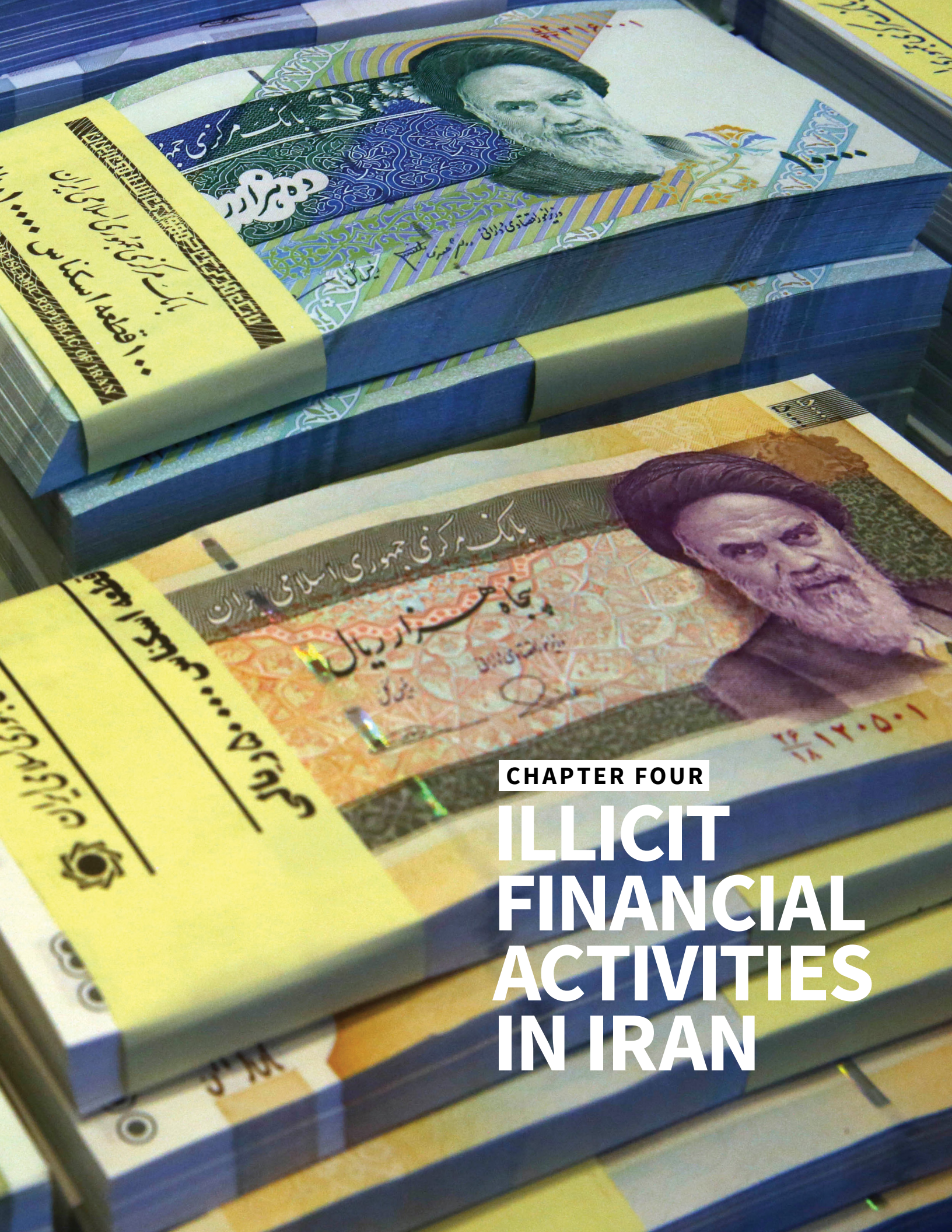
An Iranian traveling on a fake Israeli passport is arrested for conducting surveillance of the Israeli Embassy.

February 14, 2012 – Bangkok, Thailand

Three IRGC-QF operatives plan attacks against Israeli diplomats in Thailand, but are arrested after accidentally detonating explosives. One operative and five others are injured.

February 13, 2012 – New Delhi, India

IRGC-QF directs a bomb attack targeting Israeli diplomats that injures one Israeli and three Indian citizens.



CHAPTER FOUR

ILLICIT FINANCIAL ACTIVITIES IN IRAN

“The United States will cut off the IRGC’s access to capital to fund Iranian malign activity, including its status as the world’s largest state sponsor of terror, its use of ballistic missiles against our allies, its support for the brutal Assad regime in Syria, its human rights violations against its own people, and its abuses of the international financial system.”

SECRETARY OF THE TREASURY STEVEN T. MNUCHIN, MAY 2018

INTRODUCTION

The Islamic Republic regularly seeks to use deception and subterfuge to fund its myriad illicit activities, threatening the integrity and security of the international financial system. The regime primarily uses shell companies and other types of seemingly legitimate entities to exploit vulnerabilities that enable it to access financing. Although prompted for years by the international community to adopt a more stringent regulatory framework, the Iranian regime has refused to implement necessary reforms to comply with widely-accepted anti-money laundering and combatting-the-financing of terrorism standards.

MOVING MONEY FOR THE QODS FORCE

The IRGC Qods Force (IRGC-QF), the IRGC’s extra-territorial branch responsible for supporting partners and proxies in the region, continues to engage in large-scale illicit financing schemes to fund its malign activities and enrich regime leaders. This includes its support for U.S.-designated terrorist groups like Hizballah, Hamas, and Kata’ib Hizballah. In one case, IRGC-QF set up a network of front companies to exploit the currency exchange market in the United Arab Emirates (UAE) to procure and transfer hundreds of millions in U.S.-dollar denominated bulk cash. The network forged documents and disguised its conduct behind legitimate businesses. At least one Iranian front company, the Rashed Exchange, advertised its services online and appeared to be a legitimate broker. To disrupt this activity, in May 2018, the U.S. government designated nine entities.

In another scheme, the IRGC-QF used an ostensibly religious institution, Reconstruction Organization of the Holy Shrines of Iraq (ROHSI), to transfer millions of dollars to advance the IRGC’s interests in Iraq, including through a front company that served as a base for Iranian intelligence activities in Iraq and helped facilitate the shipment of weapons and ammunition to Iranian-backed militia groups. In addition, IRGC-QF officials used ROHSI’s funds to supplement IRGC-QF budgets, likely embezzling public donations intended for the construction and

maintenance of Shiite shrines in Iraq. In March 2020, the U.S. designated nine persons to disrupt this activity.

The IRGC-QF's illicit financing schemes are facilitated at the highest levels of Iran's government, including through the Central Bank of Iran (CBI). Since at least 2016, the IRGC-QF has received the vast majority of its foreign currency from the CBI, and senior CBI officials have worked directly with the IRGC-QF to facilitate CBI's financial support to the IRGC-QF. In 2017, the IRGC-QF oversaw the transfer of tens of millions of euros to Iraq from the CBI. In May 2018, the U.S. Treasury revealed that the Islamic Republic's then-CBI governor, Valiollah Seif, and the assistant director of CBI's international department conspired with IRGC-QF to illicitly conceal the movement of funds to its partner, Hizballah. The scheme also involved co-opting the chairman and chief executive of Al-Bilad Islamic Bank in Iraq to act as an intermediary, which enabled the transfer of funds to Hizballah. This scheme by the IRGC not only fueled terrorism, it also undermined the integrity of Iraq's financial system and therefore Iraq's economic growth and development. In May 2018, the U.S. designated four individuals and one entity related to this activity.

Despite these designations, during 2018 and into 2019, CBI continued to funnel several billion U.S. dollars and euros to the IRGC, transfer millions of dollars to the Houthis, and coordinate with the IRGC-QF to transfer funds to Hizballah. CBI also coordinated with Iran's National Development Fund (NDF) to provide the IRGC-QF with hundreds of millions of dollars in cash disbursements. Despite the fact that the NDF was established to serve the welfare of the Iranian people by allocating revenues that originated from selling natural resources to durable wealth and productive economic investments, in reality, the NDF was used as a slush fund for the IRGC-QF. The NDF worked with CBI to disperse half a billion U.S. dollars in 2017 and hundreds of millions of dollars in 2018 to the IRGC-QF. In September 2018, the U.S. designated both CBI and NDF for supporting special designated global terrorists, including the IRGC-QF.

In September 2019, the U.S. Department of the Treasury exposed a large oil shipping network that was directed by, and financially supported, the IRGC-QF and its partner Hizballah. The network was overseen by senior IRGC-QF official and former Iranian Minister of Petroleum Rostam

Qasemi and employed an extensive network of ship managers, vessels, and facilitators in order to move oil worth hundreds of millions of dollars or more for the benefit of the Assad regime, Hizballah, and other illicit actors. The network's complex system of intermediaries allowed the IRGC-QF to obfuscate its involvement. The IRGC-QF relied heavily on Hizballah officials and front companies to broker associated contracts. In September 2019, the United States designated sixteen entities and ten individuals to disrupt this activity and publicly identified eleven vessels used by this network.

The IRGC-QF's efforts to exploit the international financial system are not limited to fraudulent documentation or front companies. In 2017, the IRGC-QF engineered a plot to print and distribute counterfeit currency and flout the laws of European countries. It deceived European suppliers by using a series of companies in Germany to conceal its identity and end-user data to procure advanced printing machinery and other necessary materials. It then printed counterfeit Yemeni banknotes, which were used to support its destabilizing activities in Yemen and prolong the conflict. In November 2017, the U.S. Department of the Treasury designated six targets on account of their involvement in this operation. The UN Yemen Panel of Experts' 2019 report found the Iranians were using intermediaries to illegally ship fuel to the Houthis, financing their war effort and perpetuating the Yemen conflict.



AP PHOTO

Iranian President Mahmoud Ahmadinejad gives a medal of honor to an IRGC commander, who was among those who intercepted the 15 U.K. sailors and marines.

Iranian commercial airlines, particularly Mahan Air, play a key role in ferrying IRGC-QF operatives, weapons, equipment, and funds that fuel regional conflicts. Because of that critical enabling role, the IRGC-QF orchestrated an extensive plot to circumvent U.S. sanctions and export controls to procure aircraft parts. The scheme involved a series of front companies that assisted Mahan Air in procuring export-controlled, U.S.-origin goods. Following an investigation into this activity, in May 2018, the U.S. Department of the Treasury designated nine individuals and entities. The United States designated Mahan Air in 2011 for providing support to the IRGC-QF, and numerous countries in Europe and the Middle East have suspended Mahan Air flights in recent years on account of concerns about their activities. Mahan Air's current chairman and chief executive,

Hamid Arabnejad Khanooki, who is closely associated with the IRGC, was instrumental in facilitating a shipment of illicit cargo to Syria on a Mahan Air aircraft. The U.S. sanctioned Arabnejad in May 2013 for acting on behalf of Mahan Air. Since 2018, the United States has also designated seven general services providers for continuing to maintain a commercial relationship with Mahan Air.

FATF AND THE ISLAMIC REPUBLIC

The Islamic Republic has continually failed to implement international standards to combat money laundering and terrorist financing, as established by the Financial Action Task Force (FATF), a highly respected intergovernmental organization founded by the G7 in 1989. Despite the opportunities afforded to the Islamic Republic to address its strategic deficiencies – including its lack of adequate criminalization of terrorist financing – the Iranian regime failed to live up to its commitments. Thus, for the past decade, the FATF has identified Iran as a high-risk and non-cooperative jurisdiction and called on FATF members to take steps to protect the international financial system from the risks emanating from Iran. The FATF generously gave Iran more than sufficient time to correct its deficiencies, should it have chosen to do so.

Throughout 2019, the decision whether to comply with FATF measures was debated within Iran, and officials understood that continuing to flout the standards would negatively impact legitimate transactions. In March 2019, the Iranian Foreign Ministry Spokesman said that “not joining FATF will undoubtedly make Iran’s international trade more difficult and, in some cases, impossible. It will make Iran’s partners engaged in legal transactions with Iran face serious and costly problems.” One Iranian legislator said in June 2019 that “It is not in the interest of the country to place information from the whole banking system and financial transactions at the disposal of others” because there were “important security aspects.” The “security aspects” referenced by the legislator refer to Iran’s continued practice of its large-scale illicit financing schemes to fund its malign activities.

From 2016 until February 2020, the FATF had suspended its call for countermeasures against Iran in response to a high-level political commitment from Iran’s government to implement certain reforms, outlined in a ten-step action plan. The Iranian regime’s action plan expired in January 2018, and the regime’s failure to complete nine of its ten action plan items resulted in the FATF’s specific expression of disappointment in June 2018. Most critically, Iran failed to ratify the UN Palermo and Terrorism Financing Conventions. Supreme Leader Khamenei himself questioned Iran’s joining the required international conventions on terrorist financing and money laundering, which many hardliners argued

might limit Iran's ability to finance Hamas and Hizballah. After providing ample time for Iran to correct course, in February 2020 the FATF lifted its suspension of countermeasures, calling on all jurisdictions to impose effective countermeasures on Iran such as requiring financial institutions to review, amend, or if necessary terminate correspondent relationships with Iranian banks or limiting business relationships or financial transactions with Iran.



Maduro's henchmen looted nine tons of gold bars in May 2020 and sent it to the Iranian regime. The world's leading thieves have partnered with the world's leading state sponsor of terror.



CHAPTER FIVE

IRAN'S NUCLEAR PROGRAM

“As long as I am President of the United States, Iran will never be allowed to have a nuclear weapon.”

PRESIDENT DONALD TRUMP, JANUARY 8, 2020

INTRODUCTION

Iran’s nuclear program has remained a threat to international peace and it has been a source of serious concern for the international community since Iran’s secret nuclear activities first came into the public view in 2002. The uranium enrichment capabilities Iran today possesses — and which it is now expanding and seeking to use as tools of nuclear extortion — are in part ones that Iran initially developed covertly, in violation of its obligations under its legally-binding safeguards agreement with the International Atomic Energy Agency (IAEA), and in violation of the Nuclear Non-Proliferation Treaty (NPT). Despite any wishful thinking, the 2015 Joint Comprehensive Plan of Action (JCPOA) failed to provide an enduring solution to the Iranian regime’s destabilizing nuclear activities given the temporary nature of many of the deal’s key restrictions. Proponents of the JCPOA asserted that the aggressive behavior of the Iranian regime would moderate under the deal. That was not the case. The lifting of sanctions and Iran’s degree of re-integration into the global economy under the nuclear deal both empowered and emboldened Iran, making it an even more dangerous actor.

While much of the public’s attention on Iran’s nuclear program has been focused on Iran’s provocative steps to build up its uranium enrichment capabilities once again, Iran’s history of denial, delay, and deception in its engagement with the IAEA also seems to be repeating itself. The IAEA reported to its Board of Governors in March 2020 on questions of possible undeclared nuclear materials and activities in Iran, along with Iran’s refusal at that point to fully cooperate with IAEA requests to answer questions it repeatedly had asked since July 2019 and provide access to related sites for verification activities as requested in January 2020. Iran’s failure to fully address the IAEA’s concerns strikes at the heart of the Agency’s essential verification role and raises serious questions about Iran’s compliance with its safeguards and NPT obligations. The United States has made clear that a lasting diplomatic solution to resolve these concerns must be based on effective IAEA verification. The issue of possible undeclared nuclear material and activities in Iran has special salience in light of Iran’s efforts to preserve a vast archive of

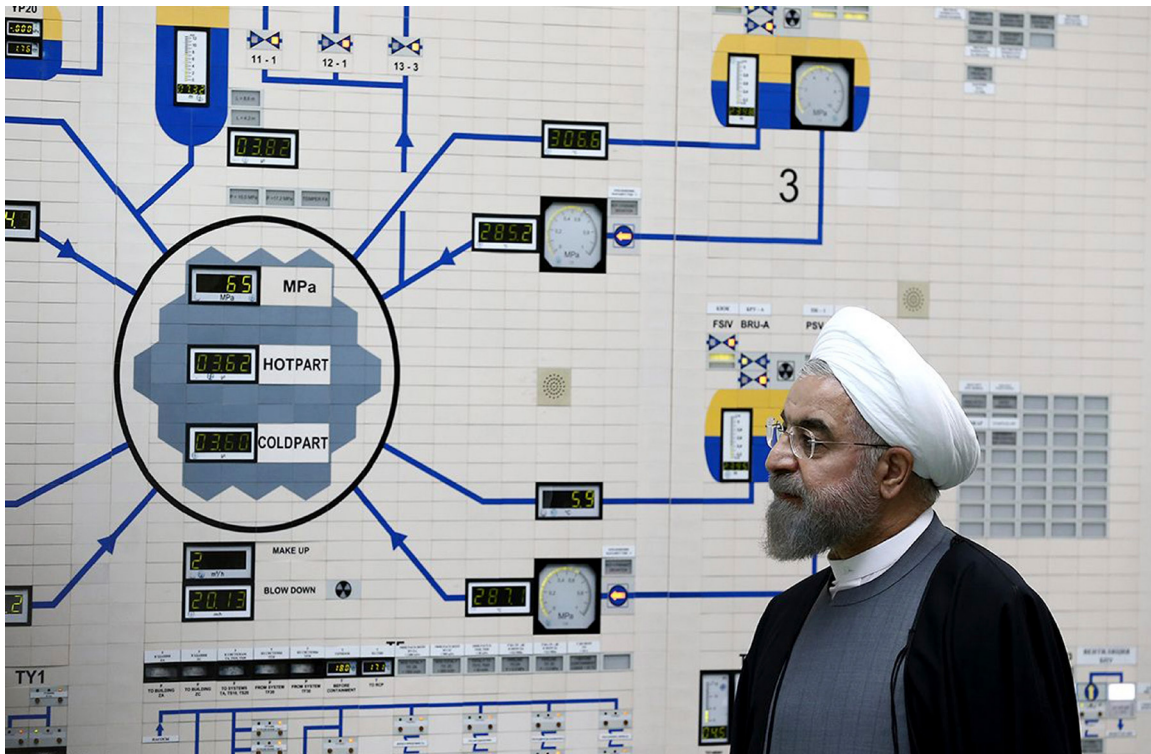
records from its past nuclear weapons program as well as retain key personnel from the program under the leadership of the former head of their nuclear weapons efforts.. Fundamentally, the open questions about Iran's compliance with its safeguards and NPT obligations all underscore the importance of ensuring the international community can have confidence that Iran has put its nuclear weapons ambitions behind it and no longer possesses any pathways to acquiring such a capability.

IAEA SAFEGUARDS CONCERNS

Safeguards are the technical measures the IAEA uses to verify that nuclear material and technology are being used only for peaceful purposes. The IAEA's global safeguards system was established more than six decades ago, and today the IAEA has legally-binding safeguards agreements with 183 nations, including Iran. The IAEA's professional and independent verification work plays a critical role in preventing the spread of nuclear weapons and strengthening the collective security for all nations. The global safeguards system has evolved over its history to incorporate lessons learned from past proliferation challenges, particularly in expanding IAEA verification authorities vis-à-vis undeclared nuclear material and activities. The combination of a Comprehensive Safeguards Agreement and Additional Protocol is the de facto global safeguards standard.

The IAEA issued its first public signal of its most recent concerns with Iran's nuclear program in August 2019, when it reported to its Board of Governors that it had been seeking cooperation from Iran on matters related to Iran's implementation of its Comprehensive Safeguards Agreement and Additional Protocol. The IAEA revealed additional details in November 2019, when it reported that it had detected chemically-processed uranium particles at a location in Iran not declared to the IAEA. While the IAEA continues to evaluate Iran's latest explanation for the presence of these uranium particles, it is both worrying and very telling that well over a year into the Agency's investigation into this location, and despite multiple engagements by the IAEA to seek clarification, Iran has thus far proven unwilling or unable to conclusively answer the Agency's questions about the activities that occurred there, the origin and presence of those particles at this location, and the current whereabouts of any items that may have been their source. Until the matter is resolved, there is no way to know the origin of the particles or how much nuclear material may be implicated by the IAEA's findings.

This is not the only open safeguards question about Iran's nuclear program the IAEA is currently investigating. The IAEA reported to its Board of Governors in March and again in June 2020 that



Iran had also failed to address multiple separate questions raised by the IAEA about possible undeclared nuclear material and activities at additional locations in Iran. Additionally, the IAEA reported that it had notified Iran to provide access to two of the locations associated with these questions in accordance with its standard safeguards practices and its legal rights under the Additional Protocol with Iran. Iran had at that point refused to provide any substantive engagement with the IAEA on these new questions, while at the same time denying the IAEA access to the two locations as it reportedly undertook actions consistent with sanitization at one location — that is, measures possibly intended to prevent IAEA inspectors from ascertaining the purpose and use of the locations. In his opening remarks to the March 2020 IAEA Board of Governors meeting, the Director General of the IAEA reported that Iran's failure to engage with IAEA requests for clarifications about its concerns was adversely affecting the Agency's ability to provide credible assurance to the international community that there are no undeclared nuclear materials or activities in Iran, a concern he repeated in his June report. Each of these matters calls into question Iran's compliance with its safeguards and NPT obligations.

In June 2020, the IAEA Board of Governors made an important rebuke of Iran's actions by adopting a resolution calling on Iran to fully cooperate with the IAEA without further delay, including by providing prompt access to the locations specified by the IAEA. On 26 August 2020, the IAEA Director General and Iran reached agreement for Iran to provide access to one of the two locations in late August and to the other in mid-September. The IAEA will continue to report on whether its initial questions have been addressed based on the information collected during these visits as well as its continued engagement with Iran. These accesses are only the first step in addressing the Agency's safeguards concerns in Iran. The United States has made clear that Iran's delay and denial cannot become the norm for the global safeguards regime. Its full and timely cooperation with the IAEA remains essential.

IRAN'S HISTORY OF NONCOMPLIANCE

For years after the initial revelations in 2002 of covert Iranian nuclear activities, Iran hid evidence of its safeguards violations and refused to come clean in the face of overwhelming evidence of its past covert nuclear weapons-related activities. The IAEA has repeatedly stated that Iran's prior obstruction seriously undermined the Agency's ability to conduct effective verification as mandated by Iran's Comprehensive Safeguards Agreement. In November 2004, the IAEA issued a comprehensive report on Iran's safeguards violations, stating, that "it is clear that Iran has failed in a number of instances over an extended period of time to meet its obligations under its Safeguards Agreement with respect to the reporting of nuclear material, its processing and its use, as well as the declaration of facilities where such material has been processed and stored." The report was followed soon thereafter by a 2005 finding by the IAEA Board of Governors that Iran was in noncompliance with its safeguards obligations; the Board subsequently reported its finding of noncompliance to the UN Security Council in 2006.

The world has long known that Iran pursued nuclear weapons in the past, despite Iran's continued denials. In 2015, the IAEA issued a report of its investigation into specific aspects of the "possible military dimensions" of Iran's previously hidden nuclear activities. That report concluded "that a range of activities relevant to the development of a nuclear explosive device were conducted in Iran prior to the end of 2003 as a coordinated effort, and some activities took place after 2003." That year, the IAEA Board of Governors decided to close consideration of the aspects of Iran's program dealt with in the 2015 report and focus instead on Iran's implementation of commitments under the JCPOA, while leaving open the possibility that the IAEA would need to use all of its authorities to pursue any new questions that arose.

The "nuclear archive" acquired by Israel — a collection of documents and data from Iran's previous nuclear weapons program, which the regime in Tehran preserved and hid at an undeclared location

after 2003 — reveals new information about the extent and nature of Iran’s past nuclear weapons program than was previously publicly known, and necessarily renews questions about Iran’s current covert activities and future nuclear intentions. As we look toward a comprehensive new deal that assures Iran cannot obtain nuclear weapons now or in the future, the very existence of this archive raises pressing questions — most obviously about Iran’s intentions in storing records that could facilitate a resumption of nuclear weapons work. In light of the new concerns regarding Iran’s safeguards cooperation raised by the IAEA, the international community must ask itself what else the Iranian regime may be continuing to hide.

THE WAY AHEAD

As the IAEA continues its work to investigate these latest questions about Iran’s nuclear program, IAEA inspectors deserve full-throated support. The international community must make clear to Iran that it faces a choice: provide immediate and full cooperation or face increasing pressure and isolation. There can be no other option. If any state were to be allowed to ignore the IAEA’s requests for clarifications and refuse access to the IAEA with no consequence, the integrity and international confidence surrounding the global safeguards system would be compromised; that the state currently in question has a woeful record over multiple decades of secretly undertaking nuclear weapons work and hiding nuclear material from the IAEA only further amplifies the gravity of the situation. The resolution adopted by the Board of Governors in June was a clear and necessary statement. What happens next is up to Iran. If Iran chooses to disregard the resolution and fails to provide clarifications and access without delay, the Board must be prepared to take further action to hold Iran accountable to its obligations. If the international community hopes to truly put to rest its well-founded concerns about Iran’s nuclear intent, it is imperative that it support the IAEA as it professionally executes its critical mandate: ensuring that no undeclared nuclear activities are occurring in Iran and that no undeclared nuclear material is being hidden in violation of Iran’s safeguards agreement required under the NPT.

Robust verification is the core of the global nonproliferation regime and the bedrock on which any durable diplomatic solution to Iran’s nuclear program must be built.



A photograph of a young woman, a university student, protesting in Tehran. She is wearing a black coat and a colorful headscarf. She is holding her right arm raised in a fist, and her left hand is near her face. The background is filled with thick white smoke, likely from a smoke grenade thrown by Iranian police. The scene is outdoors, with trees and a building visible in the background.

CHAPTER SIX

HUMAN RIGHTS ABUSES IN IRAN

A university student in
Tehran protests the regime
as a smoke grenade is
thrown by Iranian police.

“Fulfill the first duty of any government. Treat your people with the dignity to which every member of the family of mankind is entitled. Uphold your commitments under your own constitution, and international law. Act like a normal country. Unleash your people’s vast potential. We urge these things out of principle, but also as a message of common sense to the regime. True prosperity and stability will never come to Iran while you terrorize and jail your people.”

**SECRETARY OF STATE MICHAEL R. POMPEO, SPEECH AT THE STATE DEPARTMENT,
DECEMBER 19, 2019**

INTRODUCTION

Iran has an abysmal human rights record, and the outlook for the Iranian people remains dire. The Iranian regime continues to violate the human rights of those in its own territory, frequently targeting political and civil society activists as well as members of religious and ethnic minority groups. The regime’s legal systems fall woefully short of providing fair trial guarantees, and foreign and dual nationals, including U.S. citizens, are regularly targeted for arbitrary detention. The Iranian regime deploys its security forces against peaceful protesters and authorizes unprecedented levels of excessive force to suppress the universal human rights to freedom of expression, association, and peaceful assembly in Iran. In response to widespread protests that began November 15, 2019 after a fuel price increase, the government blocked almost all international and local internet connections for most of a week. In a brutal crackdown, security forces used lethal force to end the protests, killing up to 1,500 persons and detaining 8,600, according to international media reports based on sources within the regime. There have been no indications that government entities have pursued independent or impartial investigations into protester deaths.

NO TOLERANCE FOR ACTIVISM

The Iranian government targets its citizens for their peaceful civic activities and the exercise of freedom of opinion and expression and freedom of religion or belief. As of April 2020, there are more than 500 prisoners of conscience detained in Iran. The regime regularly targets journalists and restricts the online exercise of freedom of expression, including through the arrests of bloggers and social media users because of their online posts. Reporters Without Borders estimated in April 2020 that ten journalists and 12 citizen journalists remain in prison for their work and simply expressing their views. The regime also restricts the travel and speech of high-profile figures, including political candidates. Former presidential candidates Mehdi Karroubi and Mir Hossein Mousavi, as well as Mousavi’s wife, Zahra Rahnava, have been kept under house arrest without formal charges since February 2011. On September 12 the Iranian regime executed champion wrestler Navid Afzari following a sham trial and reported torture, all for Afzari’s participation in a 2018 protest.

The Iranian regime continues to crack down on activism of all kinds. Women’s rights activists, for example, have faced arbitrary arrests and detentions following protests that gained significant momentum in 2018 against compulsory hijab. Government agents arrested participants in these protests and their family members, and courts issued harsh and excessive punishments against many of them, including prison sentences of up to 20 years. For the past few years, the regime has also targeted independent trade unionists and journalists who protested peacefully regarding the right to associate freely and bargain collectively under internationally-recognized worker rights. In early April 2020, thousands of workers across sectors staged protests related to working conditions, unpaid wages, lost benefits and firings during the global COVID-19 pandemic, including bus drivers, factory, railroad, and coal workers, toll collectors and employees at the Persian Gulf International Transportation Company. As they speak out in greater numbers against the government’s corruption and mismanagement of Iran’s natural resources, environmental activists also have come under increasing scrutiny, and have been jailed, and even killed under suspicious circumstances while being detained. Some, like U.S.-Iranian dual citizen Morad Tahbaz, were jailed simply for working to preserve endangered wildlife species in Iran.

RELIGIOUS MINORITIES OF IRAN



Figures are estimates as many minorities practice their faith in secret. Images Shutterstock. Source: U.S. Department of State

Members of Iran’s numerous ethnic minority groups are also targeted by the regime, routinely facing harassment and arbitrary arrests and detention. Deaths in custody are often reported to occur under suspicious circumstances, and it has been reported that enforced disappearances of members of Iran’s Ahwazi, Azerbaijani, Balochi, and Kurdish communities, among others, continue to take place. The regime also continues to mistreat Afghan migrants, including through physical abuse by security forces, detention in unsanitary

conditions, forced labor, and even forced separation from families. In May 2020, Iranian guards on the border of Afghanistan’s Herat province reportedly tortured and drowned dozens of Afghan migrants who tried to cross the border into Iran. Credible reports from 2019 assert that the regime unlawfully recruited Afghan migrant children as young as age 14 to fight alongside Syrian regime forces in Syria, and that Afghan children have been killed fighting in the Syrian conflict.

TARGETING MEMBERS OF RELIGIOUS MINORITY GROUPS

The Iranian government represses religious freedom by directly engaging in the harassment and targeting of members of religious minority groups, particularly members of religious minority groups not recognized in the Islamic Republic's constitution. Members of minority religious communities such as Baha'is, Christians, Jews, Sabeen-Mandaeans, Zoroastrians, and Sunni and Sufi Muslims face widespread harassment, discrimination, and unjust imprisonment. Those who profess atheism or are agnostic, non-believers, or religiously unaffiliated do not publicly identify as such because they are at risk of arbitrary detention, torture, and the death penalty for "apostasy."

The regime has escalated persecution of members of the Gonabadi Sufi community, jailing at least 300 Sufis in 2017-18 for protesting the arbitrary detention of other Sufi activists. There were no government investigations into the killings of at least 20 demonstrators, including numerous members of the Gonabadi Sufi community, during the 2017-18 protests. In unjust trials, courts reportedly handed down sentences that included long prison terms, flogging, and internal exile. Human



Nasrin Sotoudeh

Rights Watch characterized the trend as "one of the largest crackdowns against a religious minority in Iran in a decade." Dozens of members of the Gonabadi Sufi community remain unjustly imprisoned, including at least 10 women who are being detained in Shahr-e Rey Prison. Dr. Noor Ali Tabandeh, the Gonabadi Sufis' 92-year-old spiritual leader, died on December 24, 2019 after almost two years of house arrest and denial of urgent medical care.

Members of other religious minority groups continue to suffer harsh treatment as well. Christians, particularly evangelicals and converts from Islam, experience high levels of arrests and detention. For example, in February 2019, the government arrested Matthias Haghnejad, the pastor of an underground Christian church in Rasht, following a church service and confiscated phones belonging to church attendees. On September 23, the Tehran Revolutionary Court sentenced Haghnejad and eight members of the church to five years in prison after a cursory trial. Media reported the Supreme Leader intervened in Pastor Haghnejad's case to allow the court to

“Iran’s human rights violations are worse than unacceptable. They’re evil, and they’re wrong.”

SECRETARY OF STATE **MICHAEL R. POMPEO**
DECEMBER 19, 2019

© AP PHOTO/MICHAEL CONROY



uphold his sentence in February 2020 without a hearing; the pastor remains in Evin Prison. Pastor Youcef Nadarkhani, a Christian convert and house church leader, along with three members of his congregation, is serving a 10-year prison sentence for “assembly and collusion against national security,” organizing underground churches, and preaching “Zionist Christianity.” Individuals belonging to the minority Sunni population are reported to face particularly harsh government treatment, including extrajudicial killings, arbitrary arrest, and torture in detention, and the Iranian regime routinely denied Sunnis permission to build houses of worship on account of their faith. Baha’is face severe repression by the government because of their beliefs, including harsh jail sentences for members of their leadership, limited access to public education and employment, confiscation of property, closure of businesses, and desecration and destruction of cemeteries. There were as many as 100 Baha’is in prison in Iran as of April 2020.

The Iranian government also targets those who stand up for the human rights of members of religious minority groups. In June 2019, authorities took Shiraz city council member Mehdi Hajati to prison to serve a one-year sentence for “propaganda against the state” following his initial arrest in 2018 for advocating for the release of two detained Baha’is. The regime released

him in January 2020, but arrested him again in March 2020 after he criticized the government's response to COVID-19 over Twitter.

NO FAIR TRIAL GUARANTEES

Court proceedings in Iran regularly fall short of the country's own legal standards as well as international obligations to ensure fair trials, including access to legal counsel and the right of criminal defendants to a review by a higher tribunal of their conviction and sentence. The government frequently subverts efforts to protect individual freedoms by limiting access to lawyers and directly targeting human rights lawyers in particular. For example, the Iranian regime arbitrarily arrested prominent human rights attorney Nasrin Sotoudeh in June 2018 for providing legal defense services to women charged with crimes for not wearing hijab. In March 2019, a revolutionary court convicted Sotoudeh on charges of endangering national security despite failing to provide evidence. The court sentenced her to thirty-eight years in prison and 148 lashes. In March 2020, she went on hunger strike to protest the Iranian government's keeping political prisoners incarcerated during the coronavirus crisis. In another example, in June 2019, the government reportedly hastily executed Benyamin Alboghbiesh, a 28-year-old Ahwazi Arab who was being held at a detention center in Ahwaz believed to be under the control of the IRGC. Authorities initially detained Alboghbiesh, along with his brother and mother, for several months beginning in March 2018, on unspecified national security accusations. All three individuals were rearrested on May 26, 2019 and the IRGC reportedly notified Alboghbiesh's family of his death on June 26, 2019. There was no information available on any investigation into the circumstances of Alboghbiesh's death.

Detainees in Iran face appalling conditions in prison. Credible reports indicate the Iranian regime regularly uses torture and other cruel, inhumane or degrading forms of punishment, particularly in Iran's notorious Evin Prison, which hosts many of Iran's political prisoners. These allegations include amputations, blinding, and flogging. The Iranian government also uses physical and mental torture to coerce confessions. Political prisoners are routinely denied access to medical care or family visitation. In May 2018, the U.S. Treasury sanctioned Evin Prison, and in December 2019, the State Department identified Great Tehran Penitentiary and Qarchak Prison for their gross violations of human rights. Great Tehran Penitentiary is known for its inhumane living conditions: unsanitary and overcrowded quarters, and rodent infestations, in addition to insufficient food,

water, and medical care. There have been reports of protesters detained in November 2019 in Great Tehran Penitentiary being subjected to violent interrogations, arbitrary beatings, and even rape. Qarchak Prison remains Iran's largest women's prison and is known for regular assaults on inmates, inappropriate behavior of prison guards towards female detainees, and the mixing of mentally ill and violent inmates with prisoners of conscience, which continue to result in cases of rape and murder.

Reflecting the dire circumstances of prisoners of conscience in Iran today, several suspicious "suicides" occurred in Iranian prisons in 2018, including the death in custody of environmental activist Kavous Seyed Emami. To date, no transparent or credible investigations have occurred, nor has any Iranian official been held accountable for these deaths. The regime frequently claims custodial deaths are the result of drug addictions, although the individuals in question often do not have a history of drug use. Families of executed prisoners do not always receive notification of their scheduled executions, and if they do, it is often on very short notice. Families of those who died in custody similarly did not always receive timely notification of their death. Authorities frequently deny families the availability to perform funeral rites or an impartial autopsy. The government also does not permit independent monitoring of prison conditions.

The Iranian regime continues to deliberately target and detain U.S. citizens and other foreign nationals, particularly dual citizens, on fabricated national-security related charges. In June 2019, the UN estimated there were at least 30 cases of dual and foreign nationals whom authorities had arrested arbitrarily and subjected to mistreatment, including the denial of appropriate medical care. The Iranian regime has unjustly detained American citizens, including Siamak and Baquer Namazi, Morad Tahbaz, and Michael White.

In December 2019, the U.S. Treasury sanctioned two judges, Abolghassem Salavati and Mohammad Moghisseh, who preside over branches of the Iranian regime's Revolutionary Court and who for years have punished Iranian citizens, and dual- and foreign-nationals for exercising their freedoms of expression or assembly. In many cases, these judges sentenced political prisoners to death.

The Iranian regime claimed it furloughed roughly 100,000 prisoners and pardoned 10,000 prisoners – including some political prisoners with fewer than five years remaining on their sentences – to mitigate the spread of COVID-19. Although it did grant medical furlough to wrongfully detained U.S. citizen Michael White, the regime has refused to do the same for Siamak Namazi or Morad Tahbaz, or to release the vast majority of its prisoners of conscience, including many members of religious minority

groups being held for exercising their faith. On April 17, 2020, eight UN special rapporteurs, joined by the UN Working Group on Arbitrary Detentions, called on Iran to release its remaining prisoners of conscience and dual and foreign nationals still being held despite serious risk of COVID-19 infection.

CAPITAL PUNISHMENT

Iran's per-capita execution rate remains among the highest in the world, despite recent reforms to reduce the number of executions for drug-related offenses. The government executes persons for crimes that fall well short of Iran's international obligation to reserve the death penalty for only "the most serious crimes," and executions are often carried out in a manner contrary to Iran's international human rights obligations. Iran executes juvenile offenders convicted of crimes committed before they were 18 years of age. The Islamic Republic's penal code permits the execution of juveniles, starting at age nine for girls and 13 for boys. Nearly 90 juvenile offenders remained on death row as of 2019, and at least seven minors were executed in 2018. The regime killed at least 23 minors during the November 2019 protests.



Donald J. Trump
@realDonaldTrump

Three individuals were sentenced to death in Iran for participating in protests. The execution is expected momentarily. Executing these three people sends a terrible signal to the world and should not be done!
[#StopExecutionsInIran](#)

12:13 PM · Jul 15, 2020 · Twitter for iPhone

30.3K Retweets 3.4K Quote Tweets 118K Likes



Donald J. Trump
@realDonaldTrump

Hearing that Iran is looking to execute a great and popular wrestling star, 27-year-old Navid Afkarai, whose sole act was an anti-government demonstration on the streets. They were protesting the "country's worsening economic situation and inflation"...

5:06 PM · Sep 3, 2020 · Twitter for iPhone

30K Retweets 2.5K Quote Tweets 108.5K Likes

HUMAN RIGHTS VIOLATIONS AND ABUSES BY PARTNERS AND PROXIES ABROAD

Iran and its partners' disregard for human rights extends well beyond its borders. In Syria, Iran-backed groups, including Lebanese Hezbollah, have repeatedly killed civilians. Since the Syrian conflict broke out in 2011, Iran has been among Bashar al-Assad's most reliable partners, extending almost \$5 billion in lines of credit to the Syrian regime and pouring resources and military personnel into the region. Iran has continued to prop up the Assad regime despite its egregious use of chemical weapons and the massive casualties among civilians. Tehran has deployed thousands of soldiers on the ground in Syria—including Islamic Revolutionary Guard Corps Ground Forces and Artesh (Iran's regular army)—and utilizes locations like Tiyas and Shayrat airfields in Homs and Al-Kiswah base south of Damascus to launch attacks.

In Iraq, Iran directly supports hardline elements associated with Iraqi Popular Mobilization Forces (PMF), including the designated foreign terrorist organization Kata'ib Hizballah. PMF units officially report to the Office of the Prime Minister, but, in practice, several units are also responsive to, and take orders from, the IRGC. There are numerous reports of intimidation, arbitrary detentions, and disappearances of Sunni persons by Iran-backed Shia militias. For example, Kata'ib Hizballah is reported to have kidnapped and intimidated local Sunni Arab residents in Diyala and Babil Governorates and prevented Sunni Arab internally displaced persons from returning to their homes.

Iran continues to provide military and financial support to Houthi rebels in Yemen. Since 2012, Iran has spent hundreds of millions of dollars on this endeavor. Iran's support of the rebels is helping to prolong the country's civil war, frustrate United Nations peace efforts, and worsen an already devastating humanitarian tragedy. According to the NGO Save the Children, Iran-backed Houthi militants reportedly engaged in the intentional targeting of dozens of hospitals in Yemen.

CHAPTER SEVEN

IRAN'S THREAT TO CYBERSECURITY

“We will not tolerate the theft of U.S. intellectual property, or intrusions into our research institutions and universities. We will continue to systematically use our sanctions authorities to shine a light on the Iranian regime’s malicious cyber practices, and hold it accountable for criminal cyber-attacks.”

UNDER SECRETARY OF THE TREASURY SIGAL MANDELKER, MARCH 2018

INTRODUCTION

The Islamic Republic is a leading threat actor in cyberspace, using espionage, propaganda, and other malicious cyber activities to influence events, shape foreign perceptions, and counter perceived threats. Iranian cyber activity is contrary to the internationally accepted norms of responsible state behavior in cyberspace undermines other states’ security interests, and regularly threatens access to an open, interoperable, reliable, and secure Internet. Similar to the regime’s support for proxies, Iran prioritizes plausible deniability for its malicious cyber activities, making attribution difficult in many cases. However, substantial evidence exists of the regime’s malign activity in cyberspace.

FOREIGN TARGETS

The Islamic Republic of Iran has developed its cyber capabilities with the intent to surveil and sabotage its adversaries, which is contrary to international norms of responsible state behavior and threatens international stability. Over the past decade, public reporting indicates that the Iranian regime has conducted cyber operations targeting governments as well as commercial and civil society entities in the United States, Israel, Saudi Arabia, and Qatar, among others. The IRGC is frequently the main force behind these cyber operations, though they often enlist hackers outside of government.

The Iranian regime typically focuses on “soft” targets, such as more vulnerable commercial entities, critical infrastructure, and non-governmental organizations. In the Middle East, Iranian cyber operations have focused heavily on Saudi Arabia and other Gulf states. In a 2012 cyber operation that was widely attributed to the Iranian regime, tens of thousands of computers used by Saudi Aramco and Qatar’s RasGas were compromised and deemed inoperable, resulting in hundreds of millions of dollars in damages. An updated version of that malicious cyber attack was again carried out between 2016 and 2017, resulting in the destruction of Saudi public and private databases, including those belonging to General Authority for Civil Aviation and the Central Bank.



Outside the Middle East, the Iranian regime has targeted the United States and other western countries through cyber-enabled espionage and sabotage. In 2016, the U.S. Attorney’s Office for the Southern District of New York and the National Security Division’s Counterintelligence and Export Control Section unsealed an indictment alleging that between late 2011 and mid-2013, IRGC-linked entities conducted a coordinated distributed denial-of-service (DDoS) campaign against the U.S. financial sector. Iran’s DDoS campaign temporarily disabled bank websites, prevented customers from accessing their accounts online, and collectively cost the victims tens of millions of dollars as the banks worked

to neutralize and mitigate the effects of the campaign. The indictment also alleged that in 2013, one of the Iranian hackers involved in the DDoS campaign also illegally accessed the industrial control system of a dam just 25 miles north of New York City. Despite the Iranian regime’s efforts to obscure its role in these incidents, the U.S. government indicted several Iranian nationals and charged that these crimes were carried out by groups with ties to the IRGC. Additionally, in 2017, the U.S. Department of Treasury designated involved Iranians under Executive Order 13694, for engaging in significant malicious cyber-enabled activity, noting that the individuals worked for private computer security companies affiliated with the IRGC. These examples shine a light on the Islamic Republic’s extensive malicious cyber activity.

The Islamic Republic’s malicious cyber activities are not limited to commercial entities or critical infrastructure. In March 2018, the U.S. Attorney’s Office for the Southern District of New York unsealed an indictment charging nine individuals associated with the Mabna Institute with conducting massive coordinated cyber intrusions from 2013 to 2017. On behalf of the IRGC, the Mabna Institute attacked the computer systems of approximately 144 U.S.-based universities and at least another 176 universities located in twenty-one other countries. Mabna Institute hackers also obtained unauthorized access to the computer systems of U.S. federal agencies, U.S. states, the United Nations, the U.N. Children’s Fund, and many domestic and foreign private sector companies.

The indictment charged that the Mabna Institute stole more than 31 terabytes of documents and data in addition to intellectual property and the contents of email inboxes. The U.S. Department of Treasury designated the Mabna Institute and the individuals involved under Executive Order 13694, for engaging in significant malicious cyber-enabled activities. During the announcement of these actions, former U.S. Department of the Treasury Under Secretary for Terrorism and Financial Intelligence, Sigal Mandelker, said, “Iran is engaged in an ongoing campaign of malicious cyber activity against the United States and our allies. The IRGC outsourced cyber intrusions to the Mabna Institute, a hacker network that infiltrated hundreds of universities to steal sensitive data.”



Working with our industry peers today, we have suspended 284 accounts from Twitter for engaging in coordinated manipulation. Based on our existing analysis, it appears many of these accounts originated from Iran.

8:01 PM - 21 Aug 2018



We've removed 652 Pages, groups and accounts for coordinated inauthentic behavior that originated in Iran and targeted people across multiple internet services in the Middle East, Latin America, UK and US. FireEye, a cybersecurity firm, gave us a tip in July about “Liberty Front Press,” a network of Facebook Pages as well as accounts on other online services. They've published an initial analysis and will release a full report of their findings soon. We wanted to take this opportunity to thank them for their work.

Based on FireEye's tip, we started an investigation into “Liberty Front Press” and identified additional accounts and Pages from their network. We are able to link this network to

DOMESTIC TARGETS

Within its borders, the Iranian regime develops and uses cyber capabilities to silence and weaken its critics, whether ordinary Iranians, members of the civil society, or elected government officials. IRGC-affiliated entities have also targeted the Islamic Republic's own diplomatic corps, with reports indicating that even Iran's Foreign Minister, Javad Zarif, was among those targeted. In addition to professionals and government officials, IRGC-affiliated entities have targeted Iran's reformist clerics and moderate political leaders and activists with cyber campaigns that have included espionage, defacement, and credential theft.

The Iranian regime utilizes its cyber capabilities to deny Iranians unrestricted access to the Internet, including by blocking access to social media sites and applications and conducting internet shutdowns. The regime funds a massive online censorship apparatus and restricts access to satellite services. Not lost on the Iranian people is the irony that while the regime cracks down on social media platforms like Twitter, regime officials such as Supreme Leader Ali Khamenei and Foreign Minister Zarif, as well as journalists sympathetic to the regime, regularly use the platforms to spread its propaganda to the outside world. In August 2018,

Facebook, Twitter, and other U.S. companies reported the removal of more than 1,000 pages, groups, and accounts they assessed were engaged in spreading disinformation on behalf of the regime. The scope of the campaign was wide. On Facebook alone, it included over 600 pages and targeted users in the United States, UK, Middle East, and Latin America. In May 2020, Facebook dismantled another network of over 500 accounts spreading disinformation that were connected to the state-owned Islamic Republic of Iran Broadcasting (IRIB).

The Iranian regime has recently taken even more extreme measures, including an almost total Internet shutdown during nationwide protests in November 2019, curtailing access for nearly all of its 80 million citizens for more than a week. The digital darkness permitted the Iranian regime to commit human rights violations and abuses beyond the scrutiny of the international community in the most lethal crackdown on anti-government protests in the history of the Islamic Republic. According to Reuters sources in Iran's Ministry of the Interior, these violations and abuses included the killing of as many as 1,500 protestors and bystanders as well as the arrests of 8,600 people. The Iranian government still has not released the names or the official number of peaceful protestors killed by security forces. Many of the detainees remain imprisoned without official charges for taking part in the November protests.

In the last year, the U.S. Department of Treasury designated several individuals and entities under sanctions authorities in connection with serious human rights abuses, censorship, or related activities in Iran. They include Abolhassan Firouzabadi, the Secretary of Iran's Supreme Council of Cyberspace, who played a leading role in the regime's ongoing efforts to block access to social media sites and applications such as Telegram in Iran, and Mohammad Javad Azari-Jahromi, who served as Iran's Minister of Information and Communications Technology during the November 2019 Internet shutdown. The Supreme Council of Cyberspace is a designated entity for its role in overseeing the censorship of speech and the media in Iran. On September 17, 2020 the Department of Treasury also designated the Iranian entity Advanced Persistent Threat 39, its front company Rana Intelligence Company, and 45 associated individuals for their use of malicious cyber attacks and tools to target and monitor Iranian citizens, particularly dissidents, journalists, former government employees, environmentalists, students, refugees, and employees of international nongovernmental organizations. They also targeted hundreds of individuals and entities from more than 30 different countries from across Asia, Africa, Europe, and North America, including approximately 15 U.S. companies.

CHAPTER EIGHT

ENVIRONMENTAL EXPLOITATION



Dried up riverbed of
the Zayandeh Roud
river in Isfahan, Iran.

“We will not tolerate the theft of U.S. intellectual property, or intrusions into our research institutions and universities. We will continue to systematically use our sanctions authorities to shine a light on the Iranian regime’s malicious cyber practices, and hold it accountable for criminal cyber-attacks.”

UNDER SECRETARY OF THE TREASURY SIGAL MANDELKER, MARCH 2018

INTRODUCTION

Corruption and mismanagement at the highest levels of the Iranian regime have produced years of environmental exploitation and degradation, with tragic results for the Iranian people. According to the United Nations Development Program’s 2019 Human Development Report, Iran scored in the bottom third of countries in most environmental categories. The unwillingness of Iran’s leaders to confront the challenges before them is moving the country toward pervasive environmental crisis. Nikahang Kowsar, an Iranian geologist living in exile, remarked, “when people lose their lands they lose everything, and that means they aren’t scared of anything. The water crisis is real and killing the country today. There are bad agricultural policies and bad water governance. It is like a time bomb.”

Limited access to potable water and poor air quality are among the top concerns for many Iranians today. These long-standing environmental issues have also contributed to the tragedy of the COVID-19 outbreak in Iran and compounded the problems confronting the Iranian people. Hundreds of thousands of Iranians have pre-existing respiratory conditions due to years of breathing unhealthy air. As a result, they face heightened health risks if they are infected by the COVID-19. Meanwhile, water consumption has increased by as much as 40 percent during the outbreak, accelerating the water crisis. As Iranians speak out in growing numbers about these hardships, the regime has responded with force to stifle dissent and obscure its own corrupt practices. As one prominent Iranian scholar said, “the people at the top are too incompetent and too corrupt to care.”

The regime’s failure to address critical environmental issues such as air pollution and potentially irreversible depletion of its water resources strikes at the heart of its inability to respond to the broader needs of its people. As it throws billions of dollars into misadventures abroad fueled by the reckless Islamic Revolutionary Guard Corps (IRGC), the Iranian regime

neglects the most basic needs at home, including the ability of its people to drink safe water and breathe clean air. When Iranian environmental activists mobilize to address what are among the most fundamental issues in any society, they are harassed, arrested, or die under suspicious circumstances.

ON THE BRINK OF CRISIS

The Iranian people feel the pain of this regime's environmental mismanagement in many ways, but limited access to water is among the most pronounced. According to a United Nations report, water shortages in Iran are so acute that agricultural livelihoods are no longer sustainable. The regime's failure to implement sound water policies has led to aquifers being depleted at potentially irreversible rates. Continued mismanagement, such as inefficient irrigation techniques, decentralized water management, continued subsidies for water-intensive crops like wheat, and excessive dam building exacerbate this trend. Iran's history of unsustainable water use and groundwater pumping has also been worsened by a years-long drought, which, according to the director of Iran's Drought and Crisis Management Center, affects approximately 96 percent of the country. Significantly increased water consumption during the COVID-19 outbreak has further exacerbated the water crisis in Iran.

The Iranian government has identified water as one of the country's foremost problems but continually fails to respond appropriately. President Hassan Rouhani previously proclaimed the Iranian government would address the people's grievances and in 2015, Supreme Leader Khamenei called on the government to "manage climate change and environmental threats such as desertification, especially dust pollution [and] drought." A senior IRGC commander noted in a public speech in 2018 that water would play a key role for Iran's national and regional security. Despite public proclamations, however, little has been done to address the problem in the two years since those remarks.

The current water crisis should come as no surprise. Former Iranian Agriculture Minister Issa Kalantari warned five years ago that, if left unresolved, the water crisis would force 50 million Iranians to migrate in the next 25 years – more than 60 percent of the population. Reports estimate that over 16 million Iranians have already fled the countryside and are now living in shantytowns. Hardships resulting from a lack of water are often worst in rural areas, where many of Iran's historically marginalized and oppressed ethnic and religious minorities reside.

Since 1979, Iran has built about 600 dams. By comparison, before the revolution, Iran had seven

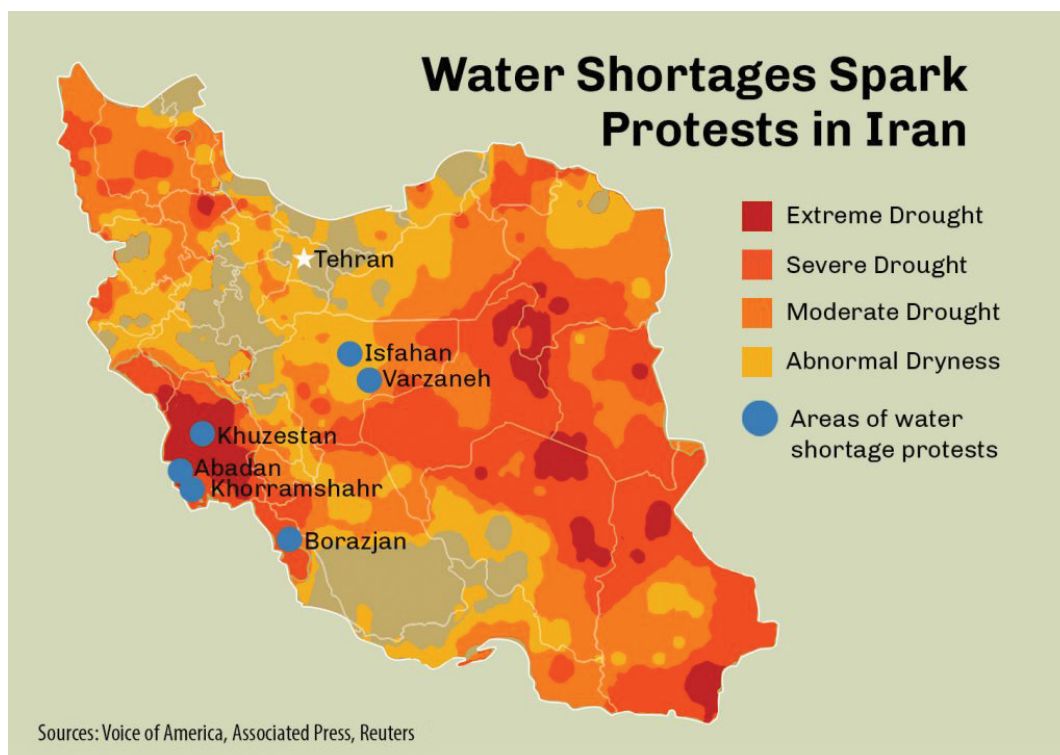
ancient dams and 14 modern ones. While it is unclear how much has been spent on the dam projects, much of the money has reportedly lined the pockets of IRGC affiliates. Abadollah Abdollahi, the commander of Khatam al-Anbiya Construction Headquarters, the IRGC's engineering arm, said in 2017 that 62 dams, accounting for half of Iran's damming capacity, were constructed by his firm. Poor planning and years of drought have rendered many of the dams useless. In many cases the dams have actually contributed to further environmental damage and the loss of much-needed water from already marginalized communities living on the social and economic margins.

Many Iranians point to Lake Urmia in northwest Iran as a textbook example of the regime's mismanagement. Once the second largest saltwater lake on earth, Lake Urmia shrunk considerably over the years and until recently was about twenty percent of its previous size. According to reports, the government began building numerous dams around it in the 1990s, slowly siphoning off its water supply or diverting it to inefficient projects. The beneficiaries of these projects were contractors from the IRGC, individuals close to the Ministry of Energy, and large agribusinesses, who all got rich as the lake drained.



AP PHOTO

Paddle boats sit on the parched Zayandeh Roud riverbed, in Isfahan, Iran. As their livelihoods are destroyed by years of the regime's mismanagement of water, farmers have increasingly taken to the streets in protest.



Air pollution also remains a severe problem in Iran. In Tehran, schools were closed for days in February 2018 and November–December 2019 because the volume of hazardous particles in the air were six to nine times higher than WHO-recommended levels. In late 2019, one Iranian woman told the Associated Press, “Breathing is really difficult for me. What can I do? If I don’t leave home, how can I take care of my daily jobs? But when I come out of the house, the air pollution really hurts me.” In a sign of the seriousness of the situation, some politicians have proposed relocating the capital due to Tehran’s air pollution. According to Iranian health officials, 30,000 Iranians die every year because of health complications from air pollution in major cities. In addition to the tragic human toll, ordinary Iranians pay a heavy economic cost as well. In 2018, Tehran Municipality’s Deputy Director of Transportation and Traffic, Mohsen Pour Seyed Aghaei, said the city’s air pollution costs Iran over \$2.6 billion a year. According to a 2016 World Bank report, the cities of Zabol, Bushehr, and Ahvaz are among the most polluted in the world. For much of the year, Ahvaz is blanketed with yellow smog and its residents suffer from respiratory and skin ailments. Across Iran, hundreds of thousands of Iranians suffer from respiratory ailments, which put them at much greater risk if they contract the coronavirus.



AP PHOTO

Tractors sit idle during a strike by Iranian farmers.

THE IRANIAN PEOPLE SPEAK OUT

Rampant government corruption and poorly implemented environmental policies have upended the lives and livelihoods of millions of Iranians, leading to protests throughout the country. These protests have been based largely in towns around central Isfahan and western Khuzestan province. The Center for Human Rights in Iran (CHRI), a leading NGO focused on human rights, said that towns and villages around Isfahan have

been hit so hard by drought and water diversion that many have emptied out. Anger at the Rouhani administration’s plans to divert water from Isfahan has led to clashes with police. The Isfahan Chamber of Commerce has reported that the drying out of the Zayandeh Roud river basin has deprived nearly two million farmers of their income. In 2018, protests by farmers in the town of Qahderijan, near Isfahan, turned violent as security forces opened fire on crowds and killed at least five people.

Khuzestan, an oil-rich province with a large population of ethnic Arabs, has suffered from large-scale desertification, industrial waste, and excessive dam projects, which many have said were built only to benefit IRGC contractors. Large protests had broken out in Ahvaz, the capital of Khuzestan province. Slogans by protestors outside the municipal governor's office in 2018 included, "Ahvaz is our city, clean air is our right," and "breath, breath, breath, the least of our demands in the world." A constant grievance of the Ahvazis is that their water is being diverted to projects that line the pockets of agribusinesses associated with the regime. Hundreds of Ahvazis have taken to the streets to protest the regime's exploitation of their land and water. Many have been arrested, with reports of protestors being killed by security forces.

In June 2018, protests in Khorramshahr, another city in Khuzestan province, also turned violent with at least one protester reportedly shot. Clashes with security forces followed weeks of water shortages, in which the local population had no access to safe water. Local water supplies were reportedly undrinkable due to high salinity and mud content, making hundreds of people sick. According to Mehr News Agency, Khorramshahr's water was too dirty even for cooking or laundry. The people were forced to buy water on the black market or stand in line in sweltering heat for water tankers to arrive. The protestors chanted that government officials were "useless" and "robbed us in the name of religion." One Iranian political commentator writing on social media summed up the frustration, writing, "For how long should the people of Khorramshahr and Abadan scream they have no water? Their date-tree farms have been destroyed, their wetlands have dried up, and dust has injured their throats

REGIME TARGETS ENVIRONMENTAL ACTIVISTS

As Iranians have become increasingly aware of the scope of their country's environmental problems, the regime has harshly cracked down on organizations working to address them. In 2018, along with dozens of environmentalists, Kavous Seyed-Emami, an Iranian-Canadian university professor and director of the Persian Wildlife Heritage Foundation (PWHF), was arrested. Seyed-Emami, falsely accused of being a spy for the United States and Israel, later died in custody under mysterious conditions, which Iranian authorities attributed to suicide. His family's request for an autopsy was denied. In May 2018, another 40 environmentalists were arrested. Most remain unjustly detained or have died in detention, a warning to all who once worked in this relatively safe and non-politicized field. In February 2020, an Iranian appeals court upheld 10-year prison sentences against six of the innocent PWHF wildlife conservationists, including a U.S. citizen, despite the fact that they were working with and had received permits from the Iranian government's own environmental officials. Hadi Ghaemi, the executive director for the Center for Human Rights in Iran, notes that "Iran desperately needs experts to help guide the government out of the country's environmental crisis that mismanagement and climate change have produced." Instead, it has put those experts in jail.





This report was produced by the Iran Action Group
and Iran Office of the Bureau for Near Eastern Affairs.